



Metro

June 2017

Committee Meetings

Public Comments Index

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June 14, 2017

Mr. Phillip A. Washington
Chief Executive Officer
Metro
One Gateway Plaza
Los Angeles, CA 90012

RE: Comments on Revised Measure M Guidelines

Dear Mr. Washington,

The Alliance for Community Transit-Los Angeles (ACT-LA) is a citywide coalition of 34 organizations representing thousands of community residents. Our vision is a transit-rich Los Angeles where all people have access to quality jobs, affordable housing, necessary social services, ample transportation options, and a voice in decision-making.

We are deeply disappointed to see that the changes made to the guidelines Local Return: TOC Investments section do not address our concerns outlined in our May 26, 2017 letter to your office. We have significant reservations with the guidelines as written due to the current lack of clarity on what constitutes eligible TOC investments.

We recommend the guidelines for TOC local return funding set equity and affordability as explicit goals. And we recommend eligible investments include those that:

1. Support the development and preservation of affordable housing, as defined in Metro's joint development policy, in TOCs;
2. Support the inclusion of small businesses in mixed-use buildings in TOCs;
3. Help remove land use barriers to transit oriented development;
4. Implement best practices and policies for sustainable and transit-supportive land uses across a variety of neighborhood typologies; and
5. Otherwise ensure inclusive and equitable transit oriented communities for those at all income levels.



We are highly concerned by the problematic new language on page 89 that reads:

Note: Jurisdictions are required to expend their Measure M LR funds for transportation purposes, as defined by these guidelines. Any Jurisdiction that violates this provision must fully reimburse the Measure M LR fund, including interest thereon, for the misspent funds and may be deemed ineligible to receive Measure M LR funds for a period of three (3) years.

As written, this requirement restricting expenditures of local return funds to “transportation purposes” potentially contradicts the entire Local Return: TOC Investments section, which includes affordable housing development and preservation. We recommend this language be eliminated, or changed to unambiguously include TOCs and affordable housing.

The Local Return: TOC Investments section of the Guidelines represents a significant opportunity to invest in strategies to stabilize transit-oriented communities made up of hard-working Angelenos, who may be dependent on public transit but are struggling with rising rents and stagnant incomes. We encourage Metro to make the above amendments to ensure that the section is as effective as possible in lowering the threat of displacement of low-income communities of color near planned transit stations.

Sincerely,

Alliance for Community Transit - Los Angeles



June 14, 2017

Honorable John Fasana
 Chair, Board of Directors
 Los Angeles County Metropolitan Transportation Authority
 One Gateway Plaza
 Los Angeles, CA 90012

RE: Revised Measure M Guidelines | Further Changes Needed Now

Dear Chair Fasana:

We know you have a lot to consider this week, so we will get right to the point. The few simple suggested edits below to the Revised Measure M Guidelines are *crucial* at this stage to ensure that previous mistakes in transportation spending not be made again. They are as follows, and are also shown as suggested redline edits in attachments A, C and D:

1. Expand the definition of "green" to include urban heat island mitigation / cooling. Extreme heat days are on the rise, and asphalt's heat radiation is a major contributor to making our city too hot – too hot to wait for the bus, walk or bike, and too hot to cut down ozone pollution. Eligibility of green infrastructure investments should include project elements that provide shade, as well as innovative materials that reflect (rather than radiate) more solar heat.
2. Expand the description of "greenways" to include other public right-of-ways (ROWs) besides storm channel basin. To allow the possibility that these multi-benefit active transportation projects may get developed in all parts of the County, existing rail and utility corridor ROWs should be eligible locations, too.
3. Replace level of service (LOS) metric with vehicle miles traveled (VMT). State legislation requires this update in the coming years, and by supporting (rather than mulling) this transition, Metro projects will have a greater chance at competing for State dollars. Highway projects should be align with State and regional climate goals, rather than undermine them.
4. Include maintenance of green infrastructure in operations subfunds. Since maintenance of green infrastructure is needed to achieve full lifecycle and community benefits, eligibility should be included in Metro operations subfunds.

- 85 10/1/16
5. Allow recreational transit service in operations subfund. Improving transit access to parks and open space is a Metro policy priority, as passed unanimously by the Board on June 23, 2016. Such service improvements should be eligible for funding from the transit operations subfund, and not only through limited Local Return dollars.

We will continue to work collaboratively through representation on the Policy Advisory Council as administrative procedures get developed in the months ahead; however, we *urge you* to take these timely suggested revisions seriously *now* – if you do not, you will severely hamper the potential for Measure M funds to improve the environmental performance of the transportation sector in Los Angeles County.

If you have any questions regarding the content of this letter, please feel free to contact Bryn Lindblad at blindblad@climateresolve.org / (213) 634-3790.

Sincerely,

The EnviroMetro core team:

Fernando Cazares, Senior Program Manager–Climate Smart Cities, The Trust for Public Land
Belinda Faustinos, Deputy Chair, San Gabriel Mountains Forever
Omar Gomez, Director of Programs, Council of Mexican Federations in North America
Jonathan Parfrey & Bryn Lindblad, Executive Director & Associate Director, Climate Resolve
Wesley Reutimann, Executive Director, Bike San Gabriel Valley
Claire Robinson, Managing Director, Amigos de los Rios
Daniel Rossman, Senior Regional Representative, The Wilderness Society

Attachments: (A) Guidelines pg. 42 | redlines for cooling & ROWs for greenways
(B) UHI one-pager
(C) Guidelines pg. 35 | redlines for changing LOS to VMT
(D) Guidelines pg. 64 & 67 | redlines for maintenance of green infrastructure & recreational transit service

- Enhance safety, remove barriers to access or correct unsafe conditions in areas of heavy traffic, high transit use, and dense bicycle and pedestrian activity;
- Promote multiple clean transportation options to reduce criteria pollutants and greenhouse gas emissions and improve air quality; and
- Improve public health through traffic safety, reduced exposure to pollutants, design infrastructure that encourage residents to use active transportation as a way to integrate physical activity in their daily lives, improve sense of place, and incorporate green infrastructure.

First/Last Mile (FLM): Infrastructure, systems and modes of travel used by transit riders to start or end their transit trips. This includes, but is not limited to, infrastructure for walking, rolling, and biking (e.g., bike lanes, bike parking, sidewalks, and crosswalks), shared-use services (e.g., bike share and car share), facilities for making modal connections (e.g., kiss and ride and bus/rail interface), signage and wayfinding, and information and technology that eases travel (e.g., information kiosks and mobile apps).

Eligible Projects

Improvements include, but are not limited to: ADA-compliant curb ramps, crosswalk upgrades, traffic signals, bus stops, carshare, bikeshare, bike parking, context-sensitive bike infrastructure, signage/wayfinding, crossing enhancements and connections, safety and comfort (including from the natural elements, e.g. shade trees), allocation of street space, and plug-in components.

Green Streets: Urban transportation rights-of-way integrated with stormwater treatment techniques and urban cooling elements that use natural processes and landscaping as well as innovative materials. Quantitatively demonstrate that they capture and treat stormwater runoff from their tributary watershed through infiltration or other means, and are included within the respective Enhanced Watershed Management Plan, and deliver cooling benefits.

Eligible Projects

Green Infrastructure includes: Cost-effective, resilient approach to managing wet-weather impacts and combating the urban heat island effect that provides many community benefits. Reduces and treats stormwater at its source and cools surface air temperature while delivering environmental, social, and economic benefits.

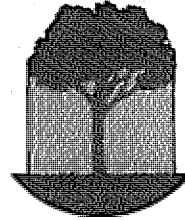
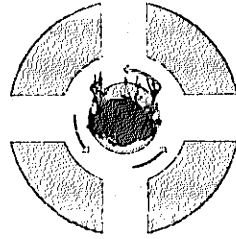
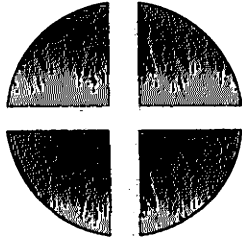
Greenway: A pedestrian and bicycle, nonmotorized vehicle transportation, and recreational travel corridor.

Eligible Projects

Examples meet the following requirements:

- Includes landscaping that improves rivers and streams, provides flood protection benefits, and incorporates the significance and value of natural, historical, and cultural resources, as documented in the local agency's applicable planning document.
- Is separated and protected from shared roadways and is adjacent to an urban waterway or utilizes an existing utility or rail corridor right-of-way, with an array of amenities.
- Is located on public lands or private lands, or a combination of both, with public access to those lands for greenway purposes.

CLIMATE RESOLVE & THE NEED FOR URBAN COOLING INVESTMENTS IN LOS ANGELES COUNTY



The Climate Situation

- UCLA climate scientists predict that temperatures in the Los Angeles region will rise 3.5-5°F over the next 20-40 years.
- The number of extreme heat days (days above 95°F) are expected to double, and even triple, in some parts of the city.

The Urban Heat Island

- Due to high amounts of paved surface area - streets, sidewalks, etc. -, urban areas can be up to 4-5°F than surrounding areas.
- Increased urban air temperatures mean decreased air quality and increased risk of heat-related illnesses.

What can be done?

- Using cool construction materials, like cool roofs and cool paving that reflect instead of absorb heat, can lower surface air temperatures.
- Increasing urban tree canopy and pervious landmass will provide shade and a natural air conditioning system for heat-afflicted cities.

The Opportunity

- Measure M presents an opportunity to make infrastructural investments that address both climate change and mobility needs, creating a cooler, greener, more mobile Los Angeles.
- Cooler, greener streets make it easier, safer, and more convenient to ride transit and use active transportation!

40%

OF THE CITY COVERED BY ASPHALT

3.5 - 5°F

EXPECTED TEMPERATURE INCREASE IN LA REGION

10-20°F

TEMPERATURE DIFFERENCE BETWEEN SURFACE AND SURROUNDING AREAS

Transit noise mitigations: similar noise barriers as highway, but along fixed-transit guideway routes.

Streetscape Enhancements and Great Streets: Great Streets concept was initiated by the City of Los Angeles to: 1) Build strong partnerships between communities and the City of Los Angeles; 2) Design streets with a community's vision of how to improve neighborhoods for all people; and 3) Implement projects that transform streets into safe, accessible, and vibrant public spaces in alignment with adopted City of Los Angeles policies.

Traffic Congestion Relief Improvements: Transportation projects that would relieve congestion, improve mobility/~~level of service~~, reduce vehicle miles traveled (VMT) and result in operational improvements along the State Highway System and arterial roadways. These projects include but are not limited to ~~roadway widening~~, geometric corrections, substantial signal synchronization, carpool lanes, park and ride facilities near freeways served by commuter transit service, dedicated right- and left-turn lanes at major signalized intersections, and other projects with verifiable benefits.

Other Highway Efficiency Program and Traffic Congestion Relief definition may include:

Freeway Service Patrol (FSP) - This is a congestion mitigation program with roving tow and service trucks which assist and/or remove disabled vehicles off the freeway to a designated safe location. The program maximizes safety by reducing the incidence of secondary accidents and minimizes delay through quick removal of disabled vehicles.

Eligibility: Freeway Service Patrol

- Expansion of the Freeway Service Patrol (regular and big rig) programs beyond current corridors and hours of operation.
- Provision of FSP services within corridors under construction to facilitate safety.

**I-605 CORRIDOR HOT SPOT INTERCHANGE IMPROVEMENTS (GATEWAY COG)
I-605/I-10 INTERCHANGE (SAN GABRIEL VALLEY COG) OR SOUTH BAY HIGHWAY
OPERATIONAL IMPROVEMENTS**

Definitions may include:

ExpressLanes- LA County's High Occupancy Managed Lanes or priced-managed lanes where HOV lanes are converted to HOT lanes enabling Solo drivers to ride in the lanes by paying a toll while HOVs with the appropriate vehicle occupancy travel free of charge.

Eligibility for ExpressLanes:

All aspects of ExpressLanes projects including design, planning, development, outreach, construction and implementation of ExpressLanes and connectors consistent with the Metro Countywide ExpressLanes Strategic Plan are eligible. The Strategic Plan may be updated on an ongoing basis to reflect changes including project acceleration and funding availability. Proposed projects must be coordinated with Metro's Congestion Reduction Department. Once constructed, the ExpressLanes will be operated by Metro based on adopted business rules.

- Rail transit operations, exclusive of bus bridges required for capital projects or disruptions in service
- Rail transit maintenance, including daily check-ups, cleaning, and repairs
- Rail transit communications, signals, power, controls, and track systems and engineering operations and upkeep
- Rail vehicle overhaul, midlife, and acquisition
- Maintenance and component replacement of rail communications, signals, power, controls, and track systems and engineering
- Rail station upkeep, repairs, and maintenance, including, but not limited to, fare gates, ticket vending machines (TVMs), transit passenger information system (TPIS) systems, shade structures and other cooling elements, green infrastructure and lighting
- Fare collection system and equipment

RESERVE/CARRYOVER REQUIREMENTS

Given the objective of the program to address Metro Rail Operations, Metro is encouraged to spend these funds in a timely manner. However, Metro may reserve or carryover its allocation to the next fiscal year.

REPORTING REQUIREMENTS

Metro will provide quarterly reports to the Measure M Independent Taxpayer Oversight Committee describing how uses of Measure M 5% Metro Rail Operations funds are contributing to accomplishing the program objectives.

Measure M funds may be used to supplement existing state, federal, and local transit funds in order to maintain the provision of the existing transit services in the event of a current or projected funding shortfall.

AUDIT REQUIREMENTS

Use of these funds will be subject to audit and oversight as determined by Measure M and all other applicable state and local laws. Metro will retain all documents and records related to this program and the use of funds for a period of three years after the year in which the funds are expended.

MEASURE M RECOGNITION

Measure M program was approved by the voters of Los Angeles County (California) and include the following:

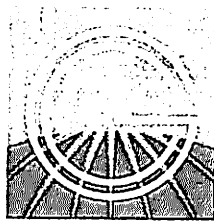
- City of Arcadia
- City of Claremont
- City of Commerce
- City of Culver City
- Foothill Transit
- City of Gardena
- City of La Mirada
- Long Beach Transit
- City of Montebello
- City of Norwalk
- City of Redondo Beach
- City of Santa Monica
- City of Torrance
- Antelope Valley Transit Authority
- City of Santa Clarita
- Los Angeles Department of Transportation
- Los Angeles County Metropolitan Transportation Authority – Operations

ELIGIBLE USES

Eligible expenses include operations for transit service, maintenance, and expansion, and any other operating expenses that will contribute to meet the above program purpose and/or objectives; this includes recreational transit service and maintenance of green infrastructure. For Metro, these funds are also eligible to be used for Metro Rail operations, and as secondary Metro Rail State of Good Repair and pilot programs for new transit services. Metro will develop policies that will define and establish criteria for implementing pilot programs.

MAINTENANCE OF EFFORT

Senate Bill No. 767 (De Leon) states that funds allocated by Metro to eligible and included municipal operators shall be used for transit operations and shall not supplant any funds authorized by other provisions of law and allocated by Metro to the eligible and included municipal operators for public transit. In addition to implementing new transit services and programs, eligible recipients may use Measure M 20% funds to supplement existing state, federal, and local transit funds in order to maintain the provision of the existing transit services in the event of a current or projected funding shortfall. Metro staff reserves the right to request appropriate documentation from eligible recipients to support the existence of a funding shortfall.



GATEWAY CITIES

June 14, 2017

Mr. John Fasana, Chair of the Board
Metro

One Gateway Plaza
Los Angeles, CA 90012

Dear Chair Fasana and the Board:

Measure M Guideline's Recommendation on Sub-Region Local Return

On behalf of the Gateway Cities Council of Governments, I am writing to express our concern over how Measure M's "Local Return" definition under Measure M Ordinance is based solely on residential population without a minimum share allocation.

Measure M just passed in November 2016. We want to demonstrate to our residents, both those who voted for Measure M and those who did not, the benefits of the Measure. We hope that the Metro Board can help do that without forcing smaller cities to accumulate our share of Local Return over the course of many years to complete a single transit project, which is what has occurred when similar transportation measures have passed.

There are cities within Los Angeles County that have transportation infrastructure needs that do not correlate directly to their populations. For example, many cities have higher "populations" during working hours because many people work, but do not live, in those cities. Other cities serve as "commuter pass-throughs" for many drivers, and in the Gateway Cities subregion we have cities that serve commerce through heavy truck traffic and suffer wear and tear on their local roads as a result. Unfortunately, neither of these scenarios correlates directly to residential population numbers. We have five cities that fall into one or both of these scenarios.

During the draft Measure M Guideline process, implementing a minimum floor of \$100,000 to the smaller cities was discussed and entertained. Nevertheless, this concept of having a minimum floor as asked by Supervisor Hahn and Mayor Garcia on the board received very little support. Indeed, it is not part of the final revised Measure M Guideline, which is before you to adopt in June's Planning/Programming and Executive Management Committees and before the full Board meeting.

Mr. John Fasana, Chair of the Board
June 14, 2017
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However, we are encouraged to learn how Metro staff, Measure M's Policy Advisory Council (PAC), and sub-regions have been supportive of including a Local Return category under the Multi-Year Sub-regional funding. And we encourage the Metro Board to adopt a minimum share allocation for Measure M's Sub-Region Local Return funding to be part of the administrative process.

We hope that smaller cities will have an avenue and a mechanism to access additional local return funding to repair and enhance our transportation infrastructure.

We support the position of Supervisor Hahn and Mayor Garcia on the minimum share allocation, as they have been vocal and public about their position in Budget, Finance and Audit Committees in May. We ask all Metro Board members to also represent smaller cities that are in need of a fair and equitable local return.

Thank you for your attention to this matter and we appreciate your leadership and support.

Sincerely,



Al Austin II, President
Board of Directors
Gateway Cities Council of Governments

cc: Honorable Hilda L. Solis, Supervisor of 1st District
Honorable Mark Ridley-Thomas, Supervisor of 2nd District
Honorable Sheila Kuehl, Supervisor of 3rd District
Honorable Janice Hahn, Supervisor of 4th District
Honorable Kathryn Barger, Supervisor of 5th District
Honorable Eric Garcetti, Mayor of City of Los Angeles
Honorable Paul Krekorian, Councilmember of 2nd District
Honorable Mike Bonin, Councilmember of 11th District
Ms. Jacquelyn Dupont-Walker, Metro Board Member
Honorable Ara Najarian, Councilmember of City of Glendale
Honorable James Butts, Mayor of City of Inglewood
Honorable Robert Garcia, Mayor of City of Long Beach
Ms. Carrie Bowen, Metro Board Member, Director of Caltrans District 7

June 14, 2017

John Fasana, Chair
Metro Board of Directors
One Gateway Plaza
Los Angeles, CA 90013

Via email to Board Secretary Michele Jackson, JacksonM@metro.net

RE: Measure M guidelines revisions

Dear Mr. Fasana,

At Investing in Place, we appreciate all the work that has gone into the revised guidelines and thank staff for making substantial improvements.

However, we are concerned the revised guidelines still lack an affirmative statement that Metro's Complete Streets Policy applies to all funding programs. Compliance with complete streets was a core commitment to organizations that supported Measure M and campaigned for its passage. This is why Metro adopted its complete streets policy in anticipation of the upcoming ballot measure. The uncertainty created by this missing policy language will expose projects to administrative and political delays as stakeholders challenge projects with no clear guidance for project sponsors on what they are required to do.

This issue can easily be addressed by adding Complete Streets to Section 1: Administration & Oversight, and then including a complete streets compliance review alongside the project eligibility review described in Section 9: Multi-year Subregional Programs.

Additionally, we seek greater clarification on the definitions of beautification and green streets infrastructure in Section 10 to ensure that functional components of complete streets like shade trees, benches, and other pedestrian amenities are not inadvertently excluded from eligibility in programs that invest in our city streets.

Lastly, the highway programs are one of the largest funding sources that will invest in our streets, so we need to ensure that these programs address safety and comfort for everyone who travels in our communities, whether they are walking, biking, taking transit, or driving.

In additions to our key concerns outlined in this letter, also attached is a policy brief we published last week analyzing the guidelines revisions. Thank you for considering our recommendations.

Sincerely,



Amanda Meza
ADVOCACY & POLICY ASSOCIATE

Attachment: Policy Brief Measure M Guidelines Response to June Revision

INVESTING *in* PLACE

Policy Brief: Measure M Guidelines Response to June Revision

June 8, 2017

Staff contact: Jessica Meaney

jessica@investinginplace.org 213-210-8136

In March, Metro issued draft guidelines for Measure M, the \$120 billion transportation measure approved by Los Angeles County voters in November. This 100+ page document, which will set the rules for how Measure M funds are administered, has attracted considerable attention from stakeholders around the region. This week, Metro released a revised draft based on comments from the Metro Policy Advisory Council (PAC), Councils of Governments (COGs), community-based organizations, and other stakeholder groups. For more background on the guidelines' purpose, role, and relationship to the Measure M Ordinance, refer to Investing in Place's April analysis.¹

Our April analysis reviewed the first draft of the guidelines and identified strengths, weaknesses, and opportunities for improvement. Then, in May, Investing in Place joined many of our partners on a comment letter further detailing our recommendations.² This brief analyzes the extent to which those recommendations were incorporated into the revised guidelines and offers further suggestions for changes before board adoption later this month.

The most substantial revision to the guidelines changes the way the Multiyear Subregional Programs are to be administered by articulating a collaborative process between Metro and the COGs that includes standards for public participation. This is a significant improvement over the draft guidelines and reflects broad consensus that the COGs should have a role in selecting priority projects within their subregions, but that that increased authority comes with the responsibility to be accountable to community members. Investing in Place strongly supports these changes.

As described below, the majority of our May recommendations were addressed, though critical improvements are still needed to address complete streets and traffic safety.

¹ <https://investinginplace.org/wp-content/uploads/2017/02/measuremguidelines-april2017policyanalysis.pdf>

² <https://investinginplace.org/wp-content/uploads/2017/06/Commentltr.MeasureMDraftGuidelines-1.pdf>

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General Recommendations

Recommendation #1: Clarify that Metro's Complete Streets Policy applies to all funding programs, including Multiyear Subregional Programs, and define Metro's oversight role to ensure compliance.

Not addressed. The revised guidelines still lack an affirmative statement that Metro's Complete Streets Policy applies to all funding programs. This leaves project sponsors and stakeholders uncertain as to which policies will apply to what projects, with differing interpretations potentially subjecting projects to administrative and political delays unless the issue is resolved. Metro's Complete Streets Policy itself is clear about its application to all projects and all programs, yet the guidelines only reference the policy under the active transportation programs, which are—by definition—in compliance with complete streets. The revised guidelines include a Metro-administered eligibility screen for all projects funded by the Multiyear Subregional Programs. This is the appropriate place for Metro to evaluate each project's compliance with its Complete Streets Policy, including the local jurisdiction mandate. The final guidelines should be revised to include this requirement unambiguously.

Recommendation #2: Ensure broad eligibility of programs that support behavior change (i.e. TDM), planning, project development, and data collection, not just capital projects.

Partially addressed. The revised guidelines expanded eligibility to include subregional program administration (capped at 0.5% of each program's annual funding) and project development. Many planning and data collection tasks can be addressed under program administration or project development, as long as they directly relate to the scoping or performance monitoring of eligible projects. Non-infrastructure programs, such as Transportation Demand Management (TDM), are still not eligible in many programs.

Recommendation #3: Avoid distributing funding in any program on a "first come, first served" basis.

Addressed. The changes to the Multiyear Subregional Programs and Subregional Equity Program will create a transparent prioritization process for these funds. All references to "first come, first served" distribution of funding have been deleted.

Recommendation #4: The final guidelines should anticipate a transportation equity policy in the Long Range Transportation Plan (LRTP) and include mechanisms to

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advance social equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs.

Partially addressed. While the revised guidelines did not add social equity as a prioritization criteria for any funding programs, they significantly increased flexibility to consider new performance metrics at a later date, particularly through the Multiyear Subregional Programs and Countywide Active Transportation Program. Investing in Place will continue to advocate for the adoption of a transportation equity policy and its implementation via appropriate funding programs in the LRTP.

Multiyear Subregional Programs

Recommendation #5: The Multiyear Subregional Programs essentially have to be built from scratch in order to develop administrative processes that are transparent, performance-driven, accountable to stakeholders, and assign the appropriate level of authority to the appropriate decision-makers. Due to the complexity of this issue and the many stakeholders involved, Investing in Place would support up to a one year extension for Metro staff and the Policy Advisory Council to develop specific guidelines for the Multiyear Subregional Programs.

Addressed. The revised guidelines outline a general framework for involvement of the COGs and other stakeholders in the development of project lists for the subregional programs and defers administrative details to additional guidelines developed within the next six months.

Recommendation #6: Remove references to Mobility Matrices for determining eligibility or priority within funding programs, and instead have clear criteria for project selection consistent with current policies.

Addressed. The new collaborative administrative process for Multiyear Subregional Programs provides broad flexibility to consider new projects and new performance measures other than those included in the Mobility Matrices.

Recommendation #7: Include advance planning functions, including programmatic studies, data collection, project development, pre-construction, and evaluation activities, within administration of Multiyear Subregional Programs.

Partially addressed. The revised guidelines allow up to 0.5% of each Multiyear Subregional Program to be spent on program administration. These functions would

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likely be eligible, though it will be up to each COG to decide whether to integrate them into program administration.

Recommendation #8: Develop a framework to include the COGs in Multiyear Subregional Programs that addresses the core values of: *Transparency and Accountability, Collaborative Decision-Making, Public Participation, Performance Measures, Innovative Project Development, and COG Capacity and Standards.*

Mostly addressed. The revised guidelines include a strong framework within which each COG will nominate 5-year project lists for approval by the Metro Board of Directors. Each COG will be required to meet minimum standards for public participation in the development of these lists. The specific administrative details of this process will be developed over the next six months. Investing in Place will continue to advocate for addressing these core values in the Multiyear Subregional Programs.

Highway Programs

Recommendation #9: Include multimodal performance metrics that reflect current planning practice, such as travel time reliability and vehicle-miles traveled (VMT), rather than outdated metrics like Level of Service (LOS) in the highway programs. Add metrics addressing public health, sustainability, and social equity. Tie program metrics to regional performance metrics in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to ensure that projects contribute toward regional goals.

Partially addressed. The revised guidelines did not update the objectives for the highway programs and still rely on outdated language to describe the programs' purpose, including the problematic Level of Service (LOS). However, the new Multiyear Subregional Program framework provides an opportunity for the introduction of new performance metrics. Investing in Place will continue to advocate for the use of current best practices for project prioritization in these programs.

Recommendation #10: Make safety the first objective for all highway programs, with particular emphasis on people walking and biking. Require all subregional highway programs to evaluate fatal and serious injury collision hotspots within their program area (i.e. a High Injury Network) and include safety countermeasures in projects within those areas.

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Not addressed. The revised guidelines did not change the objectives for any of the highway programs. Traffic safety is still not integrated into the core purpose of investments in the street and freeway system and no specific procedures are proposed to make safety analysis a routine part of highway program administration.

Recommendation #11: Promote context-sensitive solutions by employing a complete streets approach to all projects on city streets, with unambiguous objectives to meet the needs of people walking, biking, and taking transit as well as people driving. Clarify eligibility of streetscape elements, such as pedestrian amenities, shade trees, and green streets, that have functional purposes aside from beautification.

Not addressed. The revised guidelines continue to consider state of good repair, maintenance, and beautification projects ineligible for highway program funding, without clearly defining these terms to ensure that complete streets improvements are not inadvertently excluded. The revised guidelines continue to hold projects on city streets to the same objectives as freeway projects. The application of Metro's Complete Streets Policy to these programs remains unclear, despite these programs being the one of the primary funding programs for street improvements in Los Angeles County moving forward.

Countywide Active Transportation Program

Recommendation #12: Support up to a one year period to develop more detailed guidelines for the Countywide Active Transportation Program, including integrating social equity metrics into this program.

Addressed. Detailed program guidelines determining priorities for the Countywide Active Transportation Program will be developed over the next year in consultation with stakeholders.

Recommendation #13: Set aside money within the Countywide Active Transportation Program (2%) for ongoing Metro program needs, including bike share operations, open streets programs, bicycle safety education, and safe routes to school non-infrastructure programs. This funding should also support planning and project development in disadvantaged communities and pilot projects that advance the state of the practice.

Deferred until later. Program guidelines for the Countywide Active Transportation Program will be developed over the next year. Investing in Place continues to

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recommend the consideration of non-infrastructure program needs and planning in disadvantaged communities.

Subregional Equity Program

Recommendation #14: Require each subregion to prioritize its subregional equity funds in a transparent process with public participation.

Addressed. The new collaborative administrative process for Multiyear Subregional Programs will include minimum standards for public participation. The resulting five-year project lists, updated annually, will be adopted by each COG board and the Metro board at public meetings. The Subregional Equity Funds will also be allocated through this process as they become available.

ADA Paratransit and Student and Senior Discounts

Recommendation #15: Provide up to one year to establish sub-guidelines for this investment category to allow for additional public participation, similar to processes proposed in various other investment categories.

Addressed. Metro staff worked with partners including AARP to incorporate feedback into the revised guidelines. Changes include new eligibility for education and outreach programs that familiarize older adults and people with disabilities to the transit system in order to increase independent mobility and reduce reliance on ADA Paratransit, which is more expensive to provide.

Local Return

Recommendation #16: Clarify eligibility of Local Return for Transit Oriented Communities (TOC) investments by referencing existing Metro policies and programs. Explicitly support local return investments into not just the creation but the preservation of existing affordable housing in order to ensure existing transit dependent residents can remain in TOCs.

Partially Addressed. The revised guidelines now reference Metro's Transit Oriented Communities Program, which is the appropriate mechanism to guide funding toward

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the most effective strategies for increasing housing affordability near transit and reducing displacement of existing communities.

Recommendation #17: Reconsider policy basis for potential local return “floor” that is actually a fund transfer from lower-income areas to wealthy suburbs and industrial tax havens. Clearly articulate definitions for any use of terms like “fair” or “equitable” that aren’t actually based on advancing social equity, safety, or other policy objectives.

Addressed. Based on the PAC’s recommendation, the revised guidelines removed the problematic local return floor proposal that Investing in Place found to be a funding transfer from low-income communities to wealthy ones.

Investing in Place appreciates Metro staff’s diligence in responding to comments and incorporating significant changes based on stakeholder input. The revised guidelines are a step forward for ensuring that Measure M implementation supports safe, healthy, and equitable communities.

We urge Metro to integrate safety and complete streets into the highway programs before adoption of the final guidelines later this month. By clarifying the application of Metro’s existing policies and adopting best practices for traffic safety metrics, Metro can strengthen the guidelines and ensure that Measure M implementation delivers on its promised benefits for communities throughout Los Angeles County.

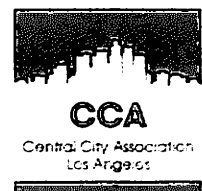
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MEASURE M POLICY GUIDELINES

GUIDING PRINCIPLES AND RECOMMENDATIONS FROM BUSINESS COMMUNITY

FINAL

June 8, 2017



For the past three years, LA County's business and small business communities have proudly worked with Metro's CEO Phil Washington, Metro Board members and staff, the region's elected officials, the multiple industries which serve LA County and our employees, and the neighborhoods which we serve and reside to rally strong support for Measure M, and ensure its passage by over 70% of the vote in November 2016.

We commend Metro for creating the Metro Measure M Policy Advisory Committee (PAC), and look forward to standing with Metro to achieve the economic benefits of **\$860 million a year**, and **465,690 new jobs** across the region, and build the proposed projects in the Mobility Matrices within 40 years. With these mobility, economic and project delivery goals in mind, we offer these guiding principles and suggestions for the Measure M Draft Policy Guidelines.

1. FULFILL THE PROMISES TO VOTERS WHO SUPPORTED MEASURE M

We are committed to helping Metro fulfill Measure M's core goals as presented to voters in: 1) the Measure M ballot language and 2) the Measure M "Los Angeles County Traffic Improvement Plan"

Measure M Ballot Language

To improve freeway traffic flow/safety; repair potholes/sidewalks; repave local streets; earthquake retrofit bridges; synchronize signals; keep senior/disabled/student fares affordable; expand rail/subway/bus systems; improve job/school/airport connections; and create jobs; shall voters authorize a Los Angeles County Traffic Improvement Plan through a ½ cent sales tax and continue the existing ½ cent traffic relief tax until voters decide to end it, with independent audits/oversight and funds controlled locally?

Measure M Los Angeles County Traffic Improvement Plan (Ordinance)

PREAMBLE

Los Angeles County's comprehensive plan to improve transportation and ease traffic congestion through the following core goals:

Improve freeway traffic flow; reduce bottlenecks and ease traffic congestion.

Expand the rail and rapid transit system; accelerate rail construction and build new rail lines; enhance local, regional, and express bus service; and improve system connectivity.

Repave local streets, repair potholes, synchronize signals; improve neighborhood streets and intersections, and enhance bike and pedestrian connections.

Keep the transit and highway system safe; earthquake-retrofit bridges, enhance freeway and transit system safety, and keep the transportation system in good working condition.

Make public transportation more accessible, convenient, and affordable for seniors, students, and the disabled and provide better mobility options for our aging population.

Embrace technology and innovation; incorporate modern technology, new advancements, and emerging innovations into the local transportation system.

Create jobs, reduce pollution, and generate local economic benefits; increase personal quality time and overall quality of life.

Provide accountability and transparency; protect and monitor the public's investments through independent audits and oversight.

2. POSITION MEASURE M MOST FAVORABLY TO RAISE \$120 BILLION IN SALES TAX RECEIPTS, BY EXPEDITING TIMELINES FOR MAJOR PROJECTS, ESPECIALLY CONNECTING JOB CENTERS AND GOODS MOVEMENT CORRIDORS

With the passage of Measure M, two percent of LA County's sales tax revenues fund transportation-related programs – Proposition A, Proposition C, Measure R and Measure M. Sales tax receipts are highly dependent on a consumer and customer-service driven economy.

In fact, Measure R's predicted sales tax receipts were reduced from \$40B down to \$34B due to the economic downturn which began in 2008. It is essential that Measure M policies focus the Mobility Matrix project investments on delivering projects that can help generate new sales tax, grow the economy and thereby meet the sales tax receipts required to fully fund Measure M.

We recommend:

- A. Metro and the Office of Extraordinary Innovation (OEI) should identify opportunities for Public Private Partnerships (P3s), and fund pre-planning and CEQA entitlement processes to expedite all major projects and those likely to have a “multiplier effect” to create new recurring funds for transit, highways, and active transportation:
 - Express Lanes network – which combines carpool and vanpool incentives, implementation of Bus Rapid Transit (BRT) service and tolling to fund active transportation programs, road improvements, and major projects as a component of P3 partnerships
 - Goods movement and clean truck priority corridors – truck fees are paid using corridors
 - Highway connectors (linking tolled Truck/HOV/Express Lanes, one freeway to another)
 - Transit enhancements connecting to growing job, education and event centers
- B. Creating policies throughout the Metro system for purchasing and P3s, for expediting procurement beyond the unsolicited bid proposal policy
- C. Providing a coherent, comprehensive and expedited approach to 3rd Party Agreements
- D. Creating major construction project efficiencies by leveraging the purchasing power of large entities such as the Ports for equipment and construction materials
- E. Create partnerships with Ports, Airports and large private entities to kickstart project funding

3. ENSURE THAT METRO'S “OPERATION SHOVEL READY” PIPELINE LEVERAGES NEW PUBLIC AND PRIVATE FUNDING OPPORTUNITIES AND COMPETITIVE TIMELINES

In addition to the passage of Measure M, the California State Legislature just passed SB1, which is predicted to generate \$52B in its first 10 years for road repair, freeway enhancements, arterial improvements, and transit. These funds will be raised primarily through fuel tax and registration fee increases. These funds offer a unique opportunity to expedite road, freeway, BRT, and state of good repair programs, but these funds are highly competitive on a statewide basis.

We recommend that Metro analyze the Operation Shovel Ready list and the Measure M project lists for those projects that would compete most favorably for these funds, and, where necessary, expedite the Operation Shovel Ready pipeline to leverage with SB1 funds and allow new projects to be added into this competitive pipeline.

We also recommend that Metro and the COGs review and optimize Metro's Operation Shovel Ready and Measure M project lists to determine which projects will compete most favorably with President Trump's administration's transportation policy goals, and which may be P3 candidates.

Leveraging these projects to be awarded new competitive state and federal funds will free up other funds within the sub-regions to complete and expedite the other high priorities.

In cases where jurisdictions such as cities, Construction Authorities and MPOs can apply for these funds, we urge Metro to create new Joint Powers Authority (JPA) agreements for alternate delivery models to leverage funds and expedite project delivery timelines.

4. EXPAND BRT CORRIDORS, PARTNER WITH ROAD REPAIR AND NEW TECHNOLOGY

The Measure M Guidelines for Countywide BRT Expansion state that the updated BRT study will be completed within 24 months of the adoption of the Measure M Guidelines. We support increased studies of BRT options, and recommend expediting the delivery process to create new BRT corridors, especially combined with new capital funds to purchase Low and Zero Emission buses, add WiFi to buses and transit stations, provide new technology for increased arterial efficiency, and partnerships with Mobility Hubs, clean fuel/charging stations and new boarding and fare technology. We recommend optimizing public and private bus/shuttle/vanpool use in the BRT lanes, especially when funded primarily with local taxpayer dollars.

It is also important to prioritize road repair with BRTs, as the quality of the ride on crumbling roads negatively effects rider experience, and poor quality roads (especially asphalt melting into bike lanes and reducing road quality) negatively effects all road users especially bicyclists and pedestrians.

We recommend that Metro review SB1 and federal guidelines for road repair priority corridors, and ensure that newly repaired roads (including use of recycled materials and concrete bus pads) be included in current and future BRT corridor plans.

5. INCREASE LOCAL JOB AND ENTREPRENEURSHIP OPPORTUNITIES, AND MITIGATE TRANSIT CONSTRUCTION IMPACTS FOR SMALL BUSINESS

Measure M can be a turning point for the economic empowerment of small business in Los Angeles County. Metro has done a very good job of inviting small and local businesses to do business with Metro but more can be done to expand small business opportunities in Measure M. We recommend that Metro follow the example of the Port of LA to include local businesses in all projects, and report to the Metro Board regularly as to how those goals are being met.

For Major projects and Local Return funds, we recommend guidelines of: 25% SBE, 17% DBE/MBE/WBE and 10% DVBE.

We recommend prioritizing local small business and retail entrepreneurship opportunities in each Transit Oriented Community/Development, including support and preservation of businesses impacted by Metro project construction. In cases where jurisdictions do not have the capacity to implement the above percentage goals, we recommend that Metro administers the program on behalf of the jurisdiction.

We also recommend that the Business Interruption Fund, to assist businesses impacted due to Metro construction, be implemented for all transit, major highway and arterial projects. Beyond the Business Interruption Fund, Metro should provide small businesses with economic tools to help offset economic losses or assist in overcoming loss of clientele due to construction obstructions. These tools can be provided by Jurisdictions or third party providers of small business advisory services.

6. MAKE LA COUNTY'S ECONOMY MORE RESILIENT BY RESTORING THE MIDDLE CLASS -- REDUCING THE COST OF TRANSPORTATION AND HOUSING AND PROVIDING GOOD PAYING JOBS IN LA COUNTY

Measure M funds will not be used directly to fund creation of new housing. However, the Transit Oriented Communities (TOCs) in the ½ mile radius around new transit stations or along BRT lines, bus arterial and transit corridors with less than 15-minute peak hour headways are supported by state and local law as the optimal locations for new development, and should include affordable housing and opportunities for local entrepreneurship.

We recommend:

- A. Metro review its bus arterial corridors to invest in service increases to reduce headways to 15 minutes or less during peak hours, in order to incentivize new residential and retail development, which will increase Metro ridership
- B. Ensure that all new TOC developments prioritize both the transit rider and transit operator experience – ie, Mobility Hubs and ample curb space for transit stops, transit operator rest areas and bus parking, transit charging areas, etc.
- C. Cities within LA County partner with Metro to appropriately re-zone current “public facility”-zoned properties near transit and create Enhanced Infrastructure Finance Districts (EIFDs) or Tax Increment Finance (TIF) and Community Facilities District (CFD) zones to support TOCs.
- D. Funds from these EIFDs, CFD and TIF zones should be allowed to fulfill a city's 3% Local Contribution for transit projects, freeing up other city funds to support active transportation, road repair and other mobility projects beyond the ½ mile radius around transit stations.
- E. Ensure additional funding for active transportation, mobility hubs and transit serving low-income and senior populations are included within each Transit Oriented Community.
- F. Within the City of Los Angeles, ensure that Measure JJJ-eligible areas are prioritized for active transportation investments and connectivity to transit, so that the resulting residential and commercial developments support union jobs, local hiring and affordable housing.

7. INVEST IN DISADVANTAGED COMMUNITIES AND POPULATIONS

The business community also campaigned for the use of sales tax to move people out of homelessness into new homes and jobs. We recommend:

- A. Cities work with Metro's Homeless Policy Task Force to identify locations for Proposition HHH and Measure H-funded services and address need for homeless services near transit
- B. Local Return funds and Transit Oriented Communities should prioritize Disadvantaged Community areas and linkages from Disadvantaged Communities to job centers
- C. Increase transit subsidies for low income and senior populations in Disadvantaged Communities, and increase Access and DASH services to move people safely and affordably.
- D. Provide guidelines that would define a business corridor as being economically disadvantaged if it were to be negatively impacted by Metro construction.

8. INCENTIVIZE GROWTH BY REWARDING HIGH GROWTH AREAS AT EACH 10-YEAR REVIEW CYCLE

As part of the 2015-2016 Measure M Mobility Matrix process, in partnership with the Councils of Governments (COGs), Metro assigned the amount of funds available for each COG by identifying a blend of population and jobs in each COG area. To further incentivize and reward areas that

embrace growth, we support re-establishing this policy every 10 years throughout the Measure M process, using population and jobs counts (nighttime and daytime populations) which will be updated to the most recent data for the year in which each 10-year review is held. We also recommend that if additional funding is available beyond Measure M's anticipated receipts, that Metro consider additional funding and project opportunities based on daytime populations, and factor in funding to increase connectivity from low income, disadvantaged areas to job rich areas.

9. CREATE AN INNOVATIVE AND TECHNOLOGICALLY CONNECTED COUNTY

Metro's Office of Extraordinary Innovation (OEI) is already becoming an innovative national model, reflecting Metro's eagerness to be at the cutting edge of new mobility innovation and technology.

We support the customer, vehicle, highway and arterial technology improvements outlined in the Intelligent Transportation Systems (ITS) and Transportation Technology Improvements section of the Metro Measure M Policy Guidelines. We recommend that these technologies, plus new pavement technologies which reduce heat island effects, be incorporated into the state and federal competitive grant applications for highway and arterial corridor improvements and road repair funding, such as under SB1. These technologies should also be incorporated in the expedited CEQA entitlement processes we recommend for highway and arterial projects, as they can help reduce travel time, reduce emissions and make these corridors work more efficiently.

We also recommend:

- A. First/Last Mile eligible projects should include low and zero-emissions vehicle (LEV and ZEV) infrastructure and LEV and ZEV car share, vanpools and shuttles
- B. Metro partner with cities to increase funding for Transportation Management Organizations (TMOs) to help educate communities about new technology availability and increase access to new technology through new transit passes and multi-modal rider connection information.
- C. Metro, the Office of Extraordinary Innovation (OEI) seek new P3 and state/federal funding opportunities to create new partnerships with transit, bus, DASH, Access Services and microtransit, LEV/ZEV car-share, and vanpools, autonomous vehicles – expanding access and reach of transit services to all communities, especially disadvantaged communities impacted by high emissions
- D. Metro, the Office of Extraordinary Innovation (OEI) seek new P3 and state/federal funding opportunities to create new partnerships for clean truck corridors.
- E. Increased opportunities for WiFi, cellular service and other technology options to encourage more people to take transit.

10. PARTNER WITH BUSINESS, COLLEGES AND UNIVERSITIES, SENIORS, LOW-INCOME AND DISABLED WORKERS TO SEEK WAYS TO FUND AND INCREASE TRANSIT RIDERSHIP

We recommend that Metro work with the business community on a regular basis to examine new ways to tailor fare structures and encourage public private partnerships to increase ridership and support adoption of new technology:

- A. Create a new monthly business transit pass to:
 1. Address the fact that the economy is moving away from "employees" to "independent contractors"
 2. Allow business to support students, low income and senior passes for its workers

- 3. Allow TMOs to purchase group rate passes for residents and workers within mixed use, job-rich areas to make transit pass purchases simpler and increase ridership.
- B. Allow funds for micro-transit, shuttles, carshare, bike-share and active transportation which are entitled and funded privately as part of Transit Oriented Developments, or which connect directly to/from Metro stations to be counted toward a city's 3% Local Match for Metro projects
- C. Prioritize increased service and late-night hour service to meet the needs of today's work hours, entertainment and international tourists who all seek transit options into late evening

11. IMPROVE SERVICES TO SENIORS, THE DISABLED, LOW INCOME AND STUDENTS

Analyze Metro current proposed split of the 2% set aside funds for senior/disabled/low-income/student transit services and passes – ACCESS 75% and 25% for seniors/low income riders/students

Examine ways that services are provided in order to encourage efficiencies, enhance technology utilization and innovation, include P3 options, and focus on quality of life connectivity for seniors, disabled and low income populations throughout LA County.

12. MANAGE DEBT

We eagerly await the completion of Metro's 2017 Debt Policy and request that it be presented to the Measure M Policy Advisory Committee as well as Metro's Taxpayer Oversight Committee. Debt management is an important area that Business community will watch carefully because 20 years ago the agency was near bankruptcy as many well-intentioned objectives spiraled out of control coupled with new board turnover who at the time lacked the institutional knowledge of funding history overspent funds quicker than what Propositions A and C had. We are concerned considering that Metro's current farebox recovery is at 24% and dropping and the current board turnover who lack the institutional history needed to make informed decisions that we may be repeating some of this history. The business community wants to partner with Metro to look at cost effective capital strategies and operational efficiencies needed to increase ridership and reduce costs, such as implementation of the Countywide Bus Rapid Transit program with traffic signal synchronization to speed service, reduce costs and add riders. In addition, there is a strong desire to accelerate key projects in the first decade of Measure M which limits funding flexibility so watching this policy is important to make every dollar count which ensures that Metro can deliver on its promise to the taxpayers on project delivery and manage the debt more effectively.

13. FOCUS ON SAFETY AND CUSTOMER EXPERIENCE

We are pleased with LA Mayor Eric Garcetti's statement that when he becomes Chairman of the Metro Board in July, he will create a new Metro committee on Customer Experience, chaired by Councilmember Mike Bonin.

We recommend that all improvements made to improve the customer experience on the existing system – such as Mobility Hubs, safety improvements, station cleanliness, and first/last mile connections – be funded through Metro and companion funds, rather than requiring cities to pay for these improvements through Local Return funds.

We also recommend that Metrolink create a similar committee on Customer Experience with a funding plan for necessary customer-focused station, service and first/last mile improvements.

14. USE LOCAL RETURN FUNDS MOST EFFICIENTLY AND AUDIT REGULARLY

Require Maintenance of Effort, so that Local Return funds add new mobility benefits. Establish 2016 as a baseline year against which Maintenance of Effort will be measured and apply to all cities in LA County and the county itself.

Maintain the voter approved distribution of Local Return by census population, rather than a \$100,000 or greater 'minimum' for smaller cities.

Consider providing incentives for additional funding for those cities interested in pooling their Local Return funds for more significant projects. Examples of these intra-city investment partnerships *include* arterial BRT or streetscape improvements, which make the entire arterial corridor more commercially desirable, thereby improving sales tax revenues for all of the partnering cities, which are essential for building the system in LA County that we need for our local economy.

Consider making this program subject to review by the Independent Tax Oversight Committee. Simple, straightforward quarterly reports on each Local Return program is recommended. Annual Audits are insufficient and do not provide enough taxpayer oversight.

SPECIFIC ADDITIONS TO THE DRAFT MEASURE M POLICY GUIDELINES

Administration & Oversight (Page 4)

Metro may want to consider having the Independent Tax Oversight Committee also review the Multi-Year Subregional Programs and Local Return funds. This oversight could be provided by, perhaps, assigning each member of the Tax Oversight Committee one subregion to review quarterly reports of expenditures for the programs

Countywide BRT Expansion (Page 5)

Support Metro's BRT program. Encourage Metro to pursue projects that include all of the identified BRT features in order to maximize the improvement in travel time and customer experience. Include DASH and private shuttles as eligible to use BRT lanes

Major Project Acceleration Amendments (Page 11)

Include "Earlier projects coming in under budget" as an event that could trigger acceleration of other projects.

Contingency Subfunds (Page 17)

Support the use of these funds to allow for advance work on projects listed

3% Local Contribution to Major Transit Projects (Page 20)

Support the 3% Local Contribution to major transit projects. This ensures local buy-in and participation in a project that will change the face of their city. Metro has provided sufficient flexibility in how that 3% can be calculated. Support allowing local jurisdictions to contribute first/last mile active transportation improvements as part of their 3% local obligation.

Multi-Year Subregional Programs (Pages 15 and 22)

Project readiness is essential – Support the use of local funds to advance projects

Metro oversight and technical expertise on this program is paramount and there should be quarterly reports on any expenditures

Any borrowing between projects in this program should be subject to review by the Independent Tax Oversight Committee

Metro Active Transportation 2% (Page 41)

Support Metro's Active Transportation program and integration with first/last mile policies

Consider providing an incentive for those programs which assist Seniors

1% Regional Rail (Page 54)

Include reference to Metrolink Strategic Plan and align funding priorities and performance criteria according to the goals set forth in that document (http://metrolinktrains.com/agency/page/title/Metrolink_Strategic_Plan).

2% ADA Paratransit for the Disabled; Metro Discount for Seniors and Students (page 65)

Revisit the proposed split of these funds (75% / 25%) between disabled and Senior/Student programs with further input from all interested parties

Examine ways services are provided to encourage efficiencies, technology utilization and innovation, including P3 options, for services to senior, disabled and students. Focus on quality of life connectivity for senior and disabled populations throughout LA County.

Local Return (Page 70)

Consider making this program subject to review by the Independent Tax Oversight Committee

Simple, straightforward quarterly reports on each Local Return program is recommended. Annual Audits are insufficient and do not provide enough taxpayer oversight.

Consider providing incentives for additional funding for those cities interested in pooling their Local Return funds for more significant projects.

SPECIFIC ADDITIONS TO THE FINAL MEASURE M POLICY GUIDELINES

Project Delivery is the emphasis that the Business Community is most focused on and while this PAC process has been encouraging, we need to remember that the core of what Measure M is about and why the voters and taxpayers voted "Yes on M" was to improve their mobility and how they move in Los Angeles County;

"To tackle our traffic crisis head on, we must trade slow and steady for bold and decisive. We must create a truly complete system that serves the needs of all commuters today, but also anticipates the riders of tomorrow ... We must put adequate funding in place to ensure our transit system remains functional for generations to come." - Mayor Eric Garcetti in an op-ed piece for the LA Times

To have the system that serves the needs of all commuters first we must deliver the projects voters supported. Given the large turnover of the Metro Board of Directors, only 2 Directors remain from the passage of Measure R in 2008 and only one Director was present during the 1990s. This institutional knowledge is critical for historical context as an example, leaders in the South Bay region still balk at the fact that from as late as Proposition C in 1990 that the Green Line to Torrance was promised to them and they will still have to wait another decade for its completion.

We will be watching closely on Project Delivery and as will the Mobility Matrix that was done just a year ago be used as a guide or will it be thrown completely out the window from the start of this new measure? Is Operation Shovel Ready just window dressing with no real teeth in looking to accelerate projects?

Page 6 - Project Acceleration, Third Bullet,

“Elements that determine eligibility of matching funds from available federal/state discretionary funding sources.”

Page 8

Thank you for including to help and benefit Small businesses

Page 10 - Performance Metrics definition.

Need clarity on the definition of performance metrics. Does that reflect the December 2015 Performance Metrics for the Mobility Matrix or will these be a new set of Metrics? Will the PAC be advised on how to define them or will that be up to the Metro Board?

Does this mean transit and highway programs will have performance on whether or not they are moving more people or are they moving more goods that essential to the consumer driven sales tax receipts which fund our Measure M program? For example, according to LAEDC, 78% of the volume and 64% of the value of the Regions goods move through our streets and highways so should one project be jeopardized over a subjective definition.

With this aspect of Performance Metrics, please consider the following definitions as this is consistent that the Mobility Matrix has now been replaced with the Multi-Year Subregional Program (MSP) Project Development process;

- Projects with the broadest economic benefit that increases sales tax revenue receipts;
- That leverage current and future sources of state and federal funding (and must be timely in their request for matching funds);
- Based on project readiness;
- Projects that optimize opportunities for TOCs/TODs;
- Consider communities with the highest need;
- Project prioritization should be made in the context that we are expecting an economic downturn and must optimize the revenue that we collect, while being able to most effectively leverage private and public resources in a manner that would expedite major projects to meet or exceed timelines promised to Measure M voters.

Page 21 - 3% Local Contribution

Need Clarity How does this definition reflect new stations that intersect existing lines, an example would be the Northern Crenshaw Extension with the Purple Line on Wilshire. Would that be considered a retrofit of an existing or the building of something new?

The goal should be to incentivize ridership increases through Multimodal connectivity so outside of Active Transportation if a local jurisdiction uses and encourages private funding to construct a transit center or Mobility Hub adjacent to a rail station, Does that count towards a city's 3% match?

Page 22 - Eligible Fund Contributions, End of section paragraph

“...amount by the conclusion of thirty percent (30%) of final design, *Asset management portfolios, Performance Incentive Grants.*“

Page 37 – Intelligent Transportation Systems, Eligible uses category

Add Bullet ***“Coordinate with Countywide BRT program to optimize on time performance and improved bus speed operations”***

Page 47 – Metro Active Transportation, Reporting requirements

“Metro will provide annual reports to the Measure M Independent Taxpayer Oversight Committee describing how uses of Measure M ~~system-connectivity projects (Highway construction)~~ **Active Transportation** funds are contributing to accomplishing the program **and strategic plan** objectives.”

Page 55 – Countywide BRT, Eligible projects first paragraph

“...potential for ridership increases including station amenities, restrooms for health, safety and quality of life, “

Page 57 in Subregional Equity Funds.

Need Clarity. A detailed explanation should identify where this fund is located relative to the Measure M pie slice, as we recall back in the June 2016 Board meeting through a motion by Director John Fasana, this Subregional Equity pot was to be incorporated as part of the 2% system connectivity, Is this still true?

Page 67 – 20% Transit Operations, Eligible uses category. Last sentence

“Metro will develop policies that will define and establish criteria for implementing pilot programs **that increases ridership and improves operational reliability”**

Page 67 – 20% Transit Operations, Maintenance of effort. Second sentence

In addition to implementing new transit services programs **that improve headways and hours of operation**, eligible recipients may use Measure M 20% funds...

Page 72 – ADA

Add Bullet ***“C) Community outreach to identify and ensure that performance metrics as outlined per contract for this program fund are adhered to and are followed.”***

Page 74 – State of Good Repair

Add Bullet: ***Station improvements that increase ridership and transit system capacity to handle more riders***

Page 92 – Local Return, Audit Requirements, First Sentence

A financial and compliance audit will be conducted annually as part of Metro’s Consolidated Audit Program to verify adherence to the Measure M guidelines **and be subject to review by the Independent Taxpayer Oversight Committee.**

Pages 98 and 99. Appendix A - Potential 3% jurisdictions.

There are examples per the Measure M ordinance and Expenditure plan, where the project explicitly does not assume a specific mode or technology of corridor (LRT vs HRT) that has not had a proper vetting through an environmental impact report.

The problem with such assumption is that it prejudices the Environmental Review Process and could place Metro in a litigious pickle albeit innocently. Those examples include on the list; East San Fernando Valley Transit Corridor, Sepulveda Pass Corridor, Vermont Corridor, Lincoln Blvd Corridor.

All specific technological (LRT or HRT) references should be removed from the list and simply explained "All 3% corridors are all assumed (funding permitted) as rail corridors.

Whereas past or currently under environmental review planned definitions, distinction of phasing or branching or logical extensions of existing Metro Rail lines or under constructed corridors to establish a consistency in definition

Examples are; West Santa Ana Corridor, Eastside Phase 2 (SR 60 or Washington Blvd), Green Line extension to Torrance or Orange Line Conversion to Rail where there is specific language included in both the expenditure plan and attachment explanation

**Top Air Pollution Reduction Targets for South Coast Air Basin
from EIR of 2016 AQMP**

Category	Count In South Coast Air Basin	2023 Reduction (tpd)	Additional 2031 Reduction (tpd)	Totals (tpd)	Comparison All Heavy Duty Vehicles and Buses
Diesel on road Trucks	2,000,000	37.0 (NOx) 4.4 (ROG)	19.0 (NOx) 8.4 (ROG)	56.0 (NOx) 12.8 (ROG)	Diesel On-Road + Diesel Off-Road 117.0 (NOx)
Diesel off road equipment e.g., construction equipment		34.0 (NOx) 21.0 (ROG)	27.0 (NOx) 20.0 (ROG)	61.0 (NOx) 41.0 (ROG)	
Gasoline Light duty cars and pickups	12,000,000	7.0 (NOx) 16.0 (ROG)	5.6 (NOx) 16.3 (ROG)	12.6 (NOx) 32.3 (ROG)	
Diesel Rail Trains		0.7 (NOx) < 0.1 (ROG)	8.0 (NOx) 0.3 (ROG)	8.7 (NOx) 0.3 (ROG)	
Transit buses		< 0.1 (NOx) < 0.1 (ROG)	0.1 (NOx) < 0.1 (ROG)	0.1 (NOx) < 0.1 (ROG)	Transit Buses 0.1 (NOx)



Los Angeles County Bicycle Coalition
634 S. Spring St. Suite 821
Los Angeles, CA 90014
Phone 213.629.2142
www.la-bike.org

PC Item 38

June 14, 2017

Metro Staff and Board of Directors
1 Gateway Plaza
Los Angeles, CA 90012

RE: LACBC Response to June Revisions to Draft Measure M Guidelines

Dear Metro staff and directors,

The Los Angeles County Bicycle Coalition (LACBC) works to make all communities in Los Angeles County healthy, safe, and fun places to bike and walk. LACBC thanks Metro staff and directors for the opportunity to provide feedback on the revised draft Measure M guidelines and congratulates Metro on this extraordinary milestone toward implementation.

The passage of Measure M presents an unparalleled opportunity to build not only a world-class transportation system, but also is an opportunity to ensure transportation justice as investments are being made in communities throughout Los Angeles County. LACBC believes that building a healthy, equitable, safe, accessible, reliable, affordable, and sustainable transportation system means respecting the needs and dignity of all residents and communities. It also means rebuilding trust between powerful public agencies and low-income communities of color that have historically been disinvested in and have been paying the price with their health, economic stability, and well being for decades.

While many of our recommendations were addressed from our May letter, a number of critical issues remain that hinder the effective and equitable implementation of Measure M.

Recommendation: Use an accurate and comprehensive definition of equity and incorporate equity metrics to identify, select, and prioritize projects. Using “equity” to describe the provision of equivalent funding to each subregion, as it is used in the existing language of the guidelines, is inaccurate and misleading.

Not addressed: The revised guidelines continue to misuse the term equity in the Subregional Equity Program; they also continue to exclude social equity as an explicit prioritization criteria for any funding program. The revised guidelines still do not include explicit mention of social equity nor the recognition that social equity will be considered in the implementation of Measure M once the LRTP is adopted.

We understand, while the revised guidelines did not add social equity as a prioritization criteria for any funding programs, they significantly increased flexibility to consider new performance metrics at a later date, particularly through the Multiyear Subregional Programs and Countywide



Los Angeles County Bicycle Coalition
634 S. Spring St. Suite 821
Los Angeles, CA 90014
Phone 213.629.2142
www.la-bike.org

Active Transportation Program. This further confirms that there is a need for a transportation equity policy and its implementation via appropriate funding programs in the LRTP.

Recommendation: Preserve and expand equitable Transit Oriented Communities (TOCs) by ensuring anti-displacement measures are coupled with transportation investments within the same neighborhood. The guidelines for TOC local return funding should have equity and affordability as an explicit goal and expand potential TOC investments to include the preservation of existing affordable housing near transit. Local return investments should build off the work Metro is already doing to encourage both the production and preservation of accessible, equitable transit-oriented communities, such as Metro's Joint Development affordable housing policies and the Metro Affordable Transit Connected Housing Program.

Not addressed: The revised guidelines did not address the recommendations above. Our continued request is to have money available for use for preservation of TOCs, in addition to their creation. We also will continue to advocate for having equity and affordability as explicit goals. Additionally, the new language at end of Local Return section (p 93) is problematic if TOC is not well defined.

Furthermore, we believe there must be clearer guidance on what types of investments are eligible. Given Metro's Board adopted policies and programs, we recommend that eligible investments include those that: support the development and preservation of affordable housing, as defined in Metro's joint development policy, in TOCs; support the inclusion of small businesses in mixed use buildings in TOCs; help remove land use barriers to transit oriented development; implement best practices and policies for sustainable and transit-supportive land uses across a variety of neighborhood typologies; and otherwise ensure inclusive and equitable transit oriented communities for those at all income levels.

Recommendation: Develop more detailed guidelines over the next year to maximize the benefits of the Countywide Active Transportation Program.

Addressed. Detailed program guidelines determining priorities for the Countywide Active Transportation Program will be developed over the next year in consultation with stakeholders.

Recommendation: Implement performance criteria for highway subfunds, make harmful expenditures ineligible, and allow that funds be used for planning active transportation corridors. All projects funded by Measure M should align with State climate goals, help achieve vehicle miles traveled reduction targets, reduce burdens on disadvantaged communities, and improve safety especially for the most vulnerable road users.

Not addressed: The revised guidelines continue to consider state of good repair, maintenance, and beautification projects ineligible for highway program funding, without clearly defining these terms to ensure that complete streets and active transportation improvements are not



Los Angeles County Bicycle Coalition
634 S. Spring St. Suite 821
Los Angeles, CA 90014
Phone 213.629.2142
www.la-bike.org

inadvertently excluded. The application of Metro's Complete Streets Policy to these programs remains unclear, despite these programs being the one of the primary funding programs for street improvements in Los Angeles County moving forward.

Recommendation: Expand green infrastructure definition to cooling benefits, do not exclude "beautification" from eligibility, and require multi-benefits. This is especially important for transit-dependent low-income communities with disproportionately less greening elements in their communities. These elements should be multi-benefit, delivering not only environmental results, but also enhancing the community experience of that space.

Not addressed: The revised guidelines continue to consider state of good repair, maintenance, and beautification projects ineligible for highway program funding, without clearly defining these terms to ensure that complete streets and active transportation improvements are not inadvertently excluded. The application of Metro's Complete Streets Policy to these programs remains unclear, despite these programs being the one of the primary funding programs for street improvements in Los Angeles County moving forward.

Recommendation: Orient competitive funding programs to meet critical needs and leverage multi-benefit investments. Require that performance criteria be developed so that funded projects meet clearly identified objectives such as: network connectivity, multi-modal mobility, sustainability, safety, equity, and community engagement.

Not addressed: The revised guidelines still do not include multimodal performance metrics that reflect current planning practice in the highway programs. Add metrics addressing public health, sustainability, and social equity. Tie program metrics to regional performance metrics in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to ensure that projects contribute toward regional goals.

Recommendation: All subregions should conduct a transparent process for prioritizing additional funding from the Subregional Equity Program with robust public participation.

Addressed: The new administrative process for Multiyear Subregional Programs will include minimum standards for public participation. The resulting five-year project lists, updated annually, will be adopted by each COG board and the Metro board at public meetings. The Subregional Equity Funds will also be allocated through this process as they become available.

Recommendation: Metro should consider a one year extension to develop specific guidelines for the Multiyear Subregional Programs; the final guidelines should remove any explicit references to the Mobility Matrices for determining eligibility or priority within funding programs.

Addressed: The revised guidelines outline a general framework for involvement of the COGs and other stakeholders in the development of project lists for the Multiyear Subregional



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Programs, and defer administrative details to additional guidelines developed within the next six months. Also, the new collaborative administrative process for Multiyear Subregional Programs provides broad flexibility to consider new projects and new performance measures other than those included in the Mobility Matrices.

Additional Recommendations and Considerations:

While the guidelines reference alignment with “Vision Zero” or equivalent policies, Metro does not have its own **Vision Zero policy** to guide investments. We recommend investing in the development and adoption of regional Metro Vision Zero guidance (policy, toolkit or framework) simultaneous to developing sub-guidelines for the 2% Active Transportation category. While specific investments and Vision Zero policies will likely be implemented by local jurisdictions rather than Metro, a regional Vision Zero policy rooted in equity (i.e., prohibition of racial profiling and prioritizing low-income neighborhoods for investment first) would encourage local jurisdictions to adopt their own policy or provide guidance in the absence of such local policy.

Additionally, the guidelines still lack an affirmative statement that Metro’s **Complete Streets Policy** applies to all funding programs. Finally, traffic **safety** is still not integrated into the core purpose of investments in the street and freeway system and no specific procedures are proposed to make safety analysis a routine part of highway program administration.

As Metro continues finalizing the Measure M guidelines, LACBC encourages you to be bold in estimating the potential you have to transform our transportation landscape into a greener, healthier, more equitable one. We also urge you to use caution and prevent Measure M funds from being expended in ways that would exacerbate environmental harms and hurt low-income communities and communities of color. We thank you for your consideration and would love to serve as a resource to your staff. If you have any questions, please feel free to give us a call.

Sincerely,

Tamika L. Butler
Executive Director