

South Bay Cities Council of Governments

December 14, 2020

HANDOUT

To: SBCCOG Transportation Committee
SBCCOG Steering Committee

From: Jacki Bacharach, Executive Director
Steve Lantz, Transportation Director

Subject: Modernizing the Metro Highway Program

Adherence to Strategic Plan:

Goal A: Environment, Transportation, and Economic Development. Facilitate, implement, and/or educate members and others about environmental, transportation, and economic development programs that benefit the South Bay. Strategy 5 – Actively pursue opportunities for infrastructure funding for member agencies.

BACKGROUND

Metro staff and the Metro Board staff are circulating draft recommendations to modernize the Metro Highway program. In essence, the recommended new eligibility guidelines described in Exhibit 1 broaden eligible uses of sub-regional highway funds to serve all users of the public infrastructure including pedestrians, cyclists, transit, the disabled, cars and trucks. Newly eligible are projects such as bike lanes and pedestrian improvements, transit shelters, and bus-only lanes.

The recommendations would also re-commit Metro to its previously-adopted Complete Streets Policy and would update performance metrics based on reducing vehicle miles travelled rather than improving highway level of service.

The recommendations were developed in Spring 2020 by a Metro Board Staff Highway Subcommittee appointed by then Metro Chair James Butts. The subcommittee charter was to broaden project eligibility under Metro's Measure R Highway Operational Improvements and Ramp/Interchange Improvements and under Metro's Measure M Multi-Year Sub-Regional Programs to include active transportation projects as stand-alone projects rather than as minor elements of highway projects.

The Subcommittee recommendations listed in Exhibit 1 would replace existing Metro sub-regional project eligibility guidelines for both the Measure R (See Exhibit 1, Appendix A) and Measure M (See Exhibit 1, Appendix B). The report also includes a list of relevant studies and reports that the Sub-Committee reviewed in developing its recommendations (See Exhibit 1, Appendix C).

The newly broadened list of eligible projects does not eliminate previously eligible highway projects that do not include active transportation elements. However, the recommended guidelines would require project applicants to submit a letter with their application describing the reasons that Complete Streets elements were considered but not included in the requested project. Because existing types of projects would continue to be eligible and the policy continues to allow project applicants to recommend traditional or new projects, SBCCOG staff

recommends that the SBCCOG support the Metro Board Sub-committee recommendations in Exhibit 1.

Metro staff has requested Councils of Governments to review the Board Sub-Committee Recommendations. Although comments have been requested by December 7, the first opportunity for SBCCOG to consider the recommendations are these meetings, the Transportation Committee and the Steering Committee acting as the Board in December.

Staff has drafted a letter to Metro reflecting SBCCOG's proposed position on the recommended changes in sub-regional program policies (See Exhibit 2).

RECOMMENDATION

The SBCCOG Transportation Committee recommends that the Steering Committee approve the SBCCOG's comments as reflected in the draft letter in Exhibit 2.

Exhibit 1 – Metro Board Sub-Committee Recommended Improvements to Metro Highway Program

Exhibit 2 – SBCCOG Draft Letter re. Metro Board Sub-Committee Recommendations

May 11, 2020

TO: James T. Butts, Metro Board Chair
FROM: Metro Board Staff Highway Subcommittee
SUBJECT: Recommended Improvements to Metro Highway Program
ACTION: APPROVE RECOMMENDATION

RECOMMENDATION

That the Metro Board:

- 1) ENDORSE the recommendations of the Metro Board Staff Highway Subcommittee; and
- 2) DIRECT the Chief Executive Officer to:
 - A) Amend the Measure R Highway Program Eligibility Criteria and initiate an amendment to the Measure M Guidelines to clarify eligibility for transit, active transportation, and complete streets improvements, as described in Attachments A and B; and
 - B) Report back in 90 days with responses to recommendations.

ISSUE

In February 2020, Metro Board Chair James Butts created a subcommittee to address various concerns related to the Metro Highway Program raised by board members, cities, councils of governments, and other stakeholders. The subcommittee reviewed relevant plans and policy documents, consulted with Metro staff, and developed recommendations regarding funding guidelines, project eligibility, complete streets, stakeholder involvement, future planning needs, and technical assistance for local jurisdictions. These recommendations are provided herein for the Board's consideration.

BACKGROUND

In 2008 and 2016, Los Angeles County voters supported multimodal funding measures to improve mobility and ease congestion by providing new transportation options. Both measures included major transit and highway capital projects, as well as funding programs for subregional projects. During the implementation of Measure M subregional programs, several cities and subregional councils of governments have raised the need for consistent policies relating to funding multimodal projects within the highway program.

Metro Board Chair James Butts appointed a subcommittee of board staff in February 2020 to provide recommendations for updating the Metro Highway Program. The Chairman’s charter was to:

“Chart a roadmap toward a more future-oriented highway program that reflects the Board’s strategic priorities of efficiency (defined multimodally), safety, equity and sustainability.”

The subcommittee met twice to discuss issues with current Highway Program policies and procedures. A third meeting was canceled in response to COVID-19. Additionally, subcommittee members reviewed dozens of relevant documents, as described in Attachment C.

DISCUSSION

Metro is the primary agency responsible for the planning, funding, constructing, operating, and maintaining Los Angeles County’s transportation system. In partnership with Caltrans, the Metro Highway Program works to plan, fund, and provide technical/professional services and construction management/support for major highway capital projects. Since the passage of Measures R and M, the Highway Program has also had responsibility for administering subregional highway programs, in partnership with councils of governments.

In October 2014, the Metro Board adopted the Complete Streets Policy, marking a shift in philosophy from traditional highway capacity projects toward comprehensive, multimodal planning and implementation. In 2016, Measure M continued this trajectory by diversifying the types of projects and programs included in the expenditure plan, incorporating stakeholder input via a “bottom up” planning process, and giving subregions a more direct role in setting funding priorities on an ongoing basis. This decentralization of highway planning and the increasing prevalence of projects on city streets makes it timely to assess the structure, policies, and procedures of the Metro Highway Program to identify opportunities for increased alignment with current board policies, funding priorities, and street design best practices.

The subcommittee focused its recommendations on how the Metro Highway Program can better fulfill Metro’s role as a planner and funder, as well as a leader. These functions are traditionally associated with planning, rather than construction. The subcommittee expressed confidence in the Highway Program’s capabilities for engineering and project delivery of freeway projects.

The subcommittee’s recommendations are as follows:

Metro as Planner

Historically, streets have been designed and operated to emphasize movement of motorized vehicles rather than people. The emergence of active transportation and smaller,

neighborhood-scale vehicles has broadened the planning objectives for highway and street improvements in response to 21st Century mobility and sustainability objectives. As the primary transportation planning agency in Los Angeles County, Metro's role is to envision how streets and freeways should function as multimodal public facilities in the coming decades to meet the region's mobility needs and support a safe, sustainable, and equitable transportation future, and then work with stakeholders and implementing public and private-sector partners to translate that vision into projects. The Complete Streets Policy recognizes these many uses of the public right-of-way and establishes procedures to ensure their adequate consideration in project development, subject to applicable exceptions. Metro should ensure the agency's multimodal vision for balancing the modal uses of public rights-of-way is integrated into each and every plan, policy, and/or project, regardless of which functional unit is leading the work.

Metro should:

1. Incorporate staff with multimodal planning expertise in all project development teams to identify opportunities and challenges early and evaluate potential solutions before options are precluded by budget and right-of-way constraints.
2. Ensure that all Metro-led highway planning processes include a multimodal stakeholder participation process that includes review of staff drafts prior to consideration by the Metro Board using existing Metro and/or COG stakeholder advisory committees or a new study-specific committee, as warranted.
3. Include analysis of greenhouse gas emissions resulting from Metro-funded highway projects in forthcoming Metro sustainability and climate action plans, including *Moving Beyond Sustainability/Sustainability Plan 2020*.
4. Incorporate multimodal recommendations in Metro's upcoming Joint Systemwide Strategic Highway Plan, the Goods Movement Strategic Plan, and any other relevant ongoing strategic planning activities.
5. Include technology, policy, and land use strategies to promote sustainable distribution and neighborhood delivery in the Goods Movement Strategic Plan and/or the I-710 Clean Truck Element.
6. Coordinate implementation of the Countywide Strategic Truck Network and Active Transportation Strategic Plan to ensure a balanced highway/arterial/street network that safely serves pedestrians, bicycles, slow-speed vehicles, buses, rail alignments, automobiles, and goods movement vehicles.
7. Incorporate Transportation Demand Management (TDM) tools and projects as components of Metro's mobility and sustainability strategies, with particular emphasis on those that reduce Vehicle Miles Traveled (VMT).

Metro as Funder

Metro administers over two-thirds of transportation funding in Los Angeles County, both as the direct recipient of four half-cent sales taxes and the programming agent for multiple state and

federal funding sources. Metro should ensure that funding decisions and guidelines are aligned with its multimodal vision.

Metro should:

1. Expand funding eligibility for transit and active transportation projects by clarifying that all multimodal project elements within a street right-of-way are eligible for highway funding programs in all applicable guidelines, including Measure R Highway Program Criteria and Measure M Guidelines. (See Attachments A and B.)
2. Clarify funding eligibility for projects and technologies that support the implementation of TDM strategies in applicable programs.
3. Ensure that project and program objectives and performance criteria are defined multimodally and equitably (e.g. using person throughput instead of vehicle throughput; safety of vulnerable road users; reduction of VMT).
4. Replace the use of Level of Service (LOS) with VMT reduction as a criterion in all funding decisions. Coordinate with Caltrans to ensure that Metro's application of VMT performance criteria is consistent with Caltrans.
5. Ensure that all discretionary funding programs, including Multiyear Subregional Programs, conform to Metro's Complete Streets Policy, which requires all funding recipients to have locally adopted complete streets policies. Provide additional technical assistance to local jurisdictions to support compliance, if needed.
6. Require the use of a complete streets checklist for all Metro-funded projects, consistent with Metro's Complete Streets Policy.
7. Establish aggregate countywide VMT reduction objectives consistent with statewide regional greenhouse gas emissions targets and ensure funding decisions support the attainment of countywide targets.

Metro as Leader

In addition to its statutory authority, Metro is a leader in the transportation sector that other agencies across the nation look to for guidance and best practices. Metro also partners with other agencies at all levels of government and holds considerable influence in these relationships. Metro should promote best practices in highway planning to achieve its vision, and seek to shape guidance from state and federal partners to promote multimodal planning.

Metro should:

1. Develop comprehensive performance evaluation methods for arterial streets, including mobility, safety, health/sustainability, and equity, and assist local governments with data collection.
2. Engage with Caltrans in the development of SB743 guidelines to responsibly transition highway planning from LOS to VMT to advance the goals outlined in this memo.

3. Research and promote best practices for emerging/increasing uses of arterial streets, including first/last mile delivery, curb management, bus transit priority, micromobility, and active transportation, including TDM best practices to support emerging modes and/or trip reduction.
4. Offer technical assistance to local jurisdictions on incorporating emerging highway/arterial and TDM best practices into their General Plan Circulation Element.
5. Maintain the confidence of Los Angeles County voters by continuing to advance projects and programs included in the Measure R and Measure M expenditure plans.

FINANCIAL IMPACT

This action has no immediate financial impact. Any future changes to project scopes or budgets will be subject to Metro's cost containment policies.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommended changes to the Metro Highway Program support the following Strategic Plan goals:

Goal 1: Providing high quality mobility options that enable people to spend less time traveling

The Highway Program will support all modes that travel on the State conventional highways and major and minor arterials, provide safer and more convenient travel options, and reduce demand for vehicular travel on congested streets and highways.

Goal 2: Deliver outstanding trip experience for all users of the transportation system

The Highway Program will plan for the safety, comfort, and conveniences of all road users.

Goal 3: Enhance communities and lives through mobility and access to opportunity

The Highway Program will invest in projects that support the mobility needs of diverse communities, including those who experience barriers to accessing private vehicles.

Goal 4: Transform LA County through regional collaboration and national leadership

The Highway Program will promote best practices in multimodal planning, stakeholder engagement, and street design amongst local, state, and federal partner agencies.

Goal 5: Provide responsive, accountable, and trustworthy governance within the Metro organization

The Highway Program will make decisions transparently and in consultation with diverse stakeholders, including local agencies and community members.

ALTERNATIVES CONSIDERED

The Board could choose not to endorse these recommendations and not to make revisions to Measure R and Measure M guidelines. This is not recommended because it would leave current conflicts over highway project eligibility and policy direction unresolved.

NEXT STEPS

These recommendations touch a wide range of staff work. In the coming weeks and months, Metro staff will need to review their roles, responsibilities, existing work plans, and scopes for plans that are underway to ensure that these recommendations are incorporated. Additionally, staff will need to revisit prior commitments, such as the Complete Streets Policy's implementation section, to set new timelines for deliverables that have not been completed on schedule. Metro staff should report back to the Board via board box in 90 days.

ATTACHMENTS

Attachment A – Recommended Revisions to Measure R Highway Program Criteria

Attachment B – Recommended Revisions to Measure M Guidelines

Attachment C – Literature Review

ATTACHMENT A

RECOMMENDED REVISIONS TO MEASURE R HIGHWAY PROGRAM CRITERIA

The following shall replace Measure R Highway Program eligibility criteria in their entirety:

Project Eligibility for Highway Operational Improvements and Ramp/Interchange Improvements

The intent of a Measure R Highway Operational Improvement is to improve multimodal efficiency, safety, equity, and sustainability along an existing State Highway corridor by reducing congestion and operational deficiencies that do not significantly expand the motor vehicle capacity of the system, or by incorporating complete streets infrastructure into the corridor, in accordance with the Board-adopted policies set forth in Metro's Complete Streets Policy, Active Transportation Strategic Plan, and First/Last Mile Strategic Plan. In addition to those eligible projects on the State Highway System, for Measure R, projects located on primary roadways, including principal arterials, minor arterials, and key collector roadways, will be considered eligible for Operational Improvements and for ramp and interchange improvements.

Examples of eligible improvement projects include:

- interchange modifications;
- ramp modifications;
- auxiliary lanes for merging or weaving between adjacent interchanges;
- curve corrections/improve alignment;
- signals and/or intersection improvements;
- two-way left-turn lanes;
- intersection and street widening
- traffic signal upgrade/timing/synchronization, including all supporting infrastructure;
- traffic surveillance;
- channelization;
- Park and Ride facilities;
- turnouts;
- shoulder widening/improvement;
- safety improvements;
- on-street bus priority infrastructure, including but not limited to bus lanes, signal prioritization, queue jumps, bus boarding islands/curb extensions, and bus stop improvements;
- Class I, II, III, or IV bikeways;
- sidewalk improvements, including but not limited to widening, shade trees, and curb ramps;
- pedestrian safety improvements, including but not limited to bulb-outs, refuge islands, midblock crossings, pedestrian signals/beacons, raised intersections/pedestrian crossings, and scramble crosswalks;

- transportation infrastructure in a public right-of-way that supports the implementation of TDM strategies.

Up to 20% of a subregion's Operational Improvement dollars may be used for soundwalls. Landscaping installed as a component of an operational improvement must be limited to no more than 20% of a project's budget. State of good repair, maintenance and/or stand-alone beautification projects are not eligible. Other projects could be considered on a case-by-case basis as long as a nexus to State Highway Operational Improvements can be shown, such as a measurable reduction in Vehicle Miles Traveled.

ATTACHMENT B

RECOMMENDED REVISIONS TO MEASURE M GUIDELINES, SECTION X MULTI-YEAR PROGRAMS (HIGHWAY SUBFUNDS)

The following shall replace subsection 'A. "Highway Efficiency and Operational Improvements" definition:' in its entirety.

Highway Efficiency and Operational Improvements includes those projects, which upon implementation, would improve regional mobility and system performance; enhance multimodal efficiency, safety, equity, and sustainability; improve traffic flow, trip reliability, travel times; and reduce recurring congestion, high-frequency traffic incident locations, and operational deficiencies on State Highways. Similarly, improvements which achieve these same objectives are eligible on major/minor arterials or key collector roadways. Highway subfunds are eligible for pre-construction and construction related project phases as referenced in Sections IX and X and are subject to eligibility criteria and phasing thresholds that will be developed within 6 months as part of the applicable administrative procedures. In accordance with the Board-adopted policies set forth in Metro's Complete Streets Policy, Active Transportation Strategic Plan, and First/Last Mile Strategic Plan, complete streets projects and project elements are eligible for highway subfunds. State of good repair, maintenance and/or stand-alone beautification projects are not eligible for Highway subfunds. Other projects could be considered on a case-by-case basis as long as a nexus to Highway Efficiency and Operational Improvements can be shown, such as a measurable reduction in Vehicle Miles Traveled.

Examples of Eligible Projects:

- System and local interchange modifications
- Ramp modifications/improvements
- Auxiliary lanes for merging or weaving between adjacent interchanges
- Alignment/geometric design improvements
- Left-turn or right-turn lanes on state highways or arterials
- Intersection and street widening/improvements
- New traffic signals and upgrades to existing signals, including left turn phasing, signal synchronization, and all supporting infrastructure
- Turnouts for safety purposes
- Shoulder widening/improvements for enhanced operation of the roadway
- Safety improvements
- Freeway bypass/freeway to freeway connections providing traffic detours in case of incidents, shutdowns or emergency evacuations
- ExpressLanes
- On-street bus priority infrastructure, including but not limited to bus lanes, signal prioritization, queue jumps, bus boarding islands/curb extensions, and bus stop improvements
- Class I, II, III, or IV bikeways
- Sidewalk improvements, including but not limited to widening, shade trees, and curb ramps

- Pedestrian safety improvements, including but not limited to bulb-outs, refuge islands, midblock crossings, pedestrian signals/beacons, raised intersections/pedestrian crossings, and scramble crosswalks
- Transportation infrastructure in a public right-of-way that supports the implementation of TDM strategies

The following shall replace subsection ‘C. “Multi-Modal Connectivity” definition:’ in its entirety.

“Multi-Modal Connectivity” definition:

Multi-modal connectivity projects include those projects, which upon implementation, would improve regional mobility and network performance; provide network connections; reduce congestion, queuing or user conflicts; enhance multimodal efficiency, safety, equity, and sustainability; encourage ridesharing; and reduce vehicle miles traveled. Project should encourage and provide multi-modal access based on existing demand and/or planned need and observed safety incidents or conflicts. Subfunds are eligible for pre-construction and construction related work phases of projects with the restrictions outlined under “Pre-Construction Activities” title under Readiness in Section IX. State of good repair, maintenance and/or stand-alone beautification projects are not eligible for Highway subfunds.

Examples of Eligible Projects:

- Transportation Center expansions
- Park and Ride expansions
- Multi-modal access improvements
- New mode and access accommodations
- First/last mile infrastructure

The following shall replace subsection ‘D. “Freeway Interchange Improvement” definition:’ in its entirety.

“Freeway Interchange Improvements” definition:

Freeway Interchange Improvements includes those projects, which upon implementation, would improve regional mobility and system performance; enhance safety by reducing conflicts; improve traffic flow, trip reliability, and travel times; and reduce recurring congestion and operational deficiencies on State Highways. Similarly, improvements on major/minor arterials or key collector roadways which achieve these same objectives are also eligible under this category. Highway subfunds are eligible for pre-construction and construction related work phases of projects with the restrictions outlined under “Pre-Construction Activities” title under Readiness in Section IX. In accordance with the Board-adopted policies set forth in Metro’s Complete Streets Policy, Active Transportation Strategic Plan, and First/Last Mile Strategic Plan, complete

streets projects and project elements are eligible for highway subfunds. State of good repair, maintenance improvements and/or stand-alone beautification projects are not eligible for Highway subfunds.

The following shall replace subsection 'E. "Arterial Street Improvements" definition:' in its entirety.

“Arterial Street Improvements” definition:

Arterial Street improvements include those projects, which upon implementation would improve regional mobility and system performance; enhance multimodal efficiency, safety, equity, and sustainability; improve traffic flow, trip reliability, and travel times; and reduce recurring congestion and operational deficiencies. Projects must have a nexus to a principal arterial, minor arterial or key collector roadway. The context and function of the roadway should be considered (i.e., serves major activity center(s), accommodates trips entering/exiting the jurisdiction or subregion, serves intra-area travel) and adopted in the City’s general plan. In accordance with the Board-adopted policies set forth in Metro’s Complete Streets Policy, Active Transportation Strategic Plan, and First/Last Mile Strategic Plan, complete streets projects and project elements are eligible for highway subfunds. Highway subfunds are eligible for pre-construction and construction related work phases of projects with the restrictions outlined under “Pre-Construction Activities” title under Readiness in Section IX. State of good repair, maintenance improvements and/or stand-alone beautification projects are not eligible for Highway subfunds.

Examples of Eligible Projects:

- Intersection or street widening
- Two-way left-turn or right turn lanes
- New traffic signals and upgrades to existing signals, including left turn phasing
- Sight distance corrections/improve alignment
- Turnouts
- Safety improvements
- On-street bus priority infrastructure, including but not limited to bus lanes, signal prioritization, queue jumps, bus boarding islands/curb extensions, and bus stop improvements
- Class I, II, III, or IV bikeways
- Sidewalk improvements, including but not limited to widening, shade trees, and curb ramps
- Pedestrian safety improvements, including but not limited to bulb-outs, refuge islands, midblock crossings, pedestrian signals/beacons, raised intersections/pedestrian crossings, and scramble crosswalks
- Transportation infrastructure in a street right-of-way that supports the implementation of TDM strategies

ATTACHMENT C

LITERATURE REVIEW

The subcommittee members reviewed precedential documents to establish a baseline understanding of current highway-related policies and practices. Reviewed documents include the following board-approved policies, program guidelines, board actions, administrative procedures, and relevant highway studies (in chronological order):

- Board motion on Status Report on Financial Forecast to Deliver Twenty-Eight by '28 (February 2019)
- Metro's "Vision 2028 Plan" (June 2018)
- City College of New York's Complete Streets Considerations for Freight and Emergency Vehicle Operations (May 2018)
- Board-adopted Measure M Master Guidelines including Substitute Motion (June 2017)
- Measure M Ordinance (June 2016)
- Los Angeles County Strategic Goods Movement Arterial Plan (CSTAN) (May 2015)
- Subregional Mobility Matrices (April 2015)
- Board-adopted Complete Streets Policy (October 2014)
- Recommendations from the Reconvened Measure R Highway Advisory Committee (2014)
- Board-approval of the updated project list of the Measure R Highway Subregional Programs in six subregions (November 2013)
- Clarification Board Item on Project Eligibility for Measure R Highway Operational Improvements and Ramp Interchange Improvements (June 2012)
- Board-adopted 2009 Long Range Transportation Plan for Los Angeles County including Attachment D-1, Clarification on Project Eligibility for Highway Operational Improvement and Ramp/Interchange Improvements, of the Measure R Highway Program Funding Strategy (October 2009)
- 2009 Long Range Transportation Plan Update: Guiding Principles and Financial Assumptions (September 2009 Board Item)
- Measure R Ordinance (2008)
- Proposition C Ordinance (1990)
- "On the Road to the Year 2000 - Highway Plan for LA County" (1987)
- Proposition A Ordinance (1980)

Draft SBCCOG Letter

Phillip Washington
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: SBCCOG Comments on Metro Board Highway Sub-Committee Recommendations To
Modernize the Metro Highway Program

Dear Mr. Washington:

Metro staff has requested that the Councils of Governments comment on the recommendations proposed by the Metro Board Sub-Committee report on Highway Program Modernization. The SBCCOG commends the sub-committee for its recommendations and supports the Metro Board's adoption of the report as written.

We believe the recommendations will benefit South Bay project sponsors by expanding eligibility of Measure M and Measure R Subregional funds to include projects that improve the public rights-of-way for all users, rather than just for cars and trucks. We believe there will be strong interest in developing and delivering Complete Streets transit and active transportation projects using these funds

We also fully support the use of performance metrics in the project selection process that allow projects to be selected based on reducing Vehicle Miles Travelled rather than the traditional Highway Level of Service. However, since there are instances in which a bike lane or bus lane is incompatible, such as on heavy truck routes, it is most important that project sponsors be allowed to use metrics and eligibility criteria appropriate to the project needs and project benefits. Therefore, we would strongly support the modernized guidelines continuing to allow highway projects to be funded that reduce delay on our congested streets or that reduce vehicle miles travelled.

We believe that the guidelines, as written, provide for the flexibility but caution that Metro staff not feel constrained by the new VMT-only performance criteria and so will not allow a highway project that improves LOS without improving VMT even though it is important to the community. If a project does not include Complete Street elements, we can support the new requirement for a project sponsor to submit a letter explaining why Complete Streets elements are not incorporated. However, we cannot support a policy that would prevent a highway project that does not include Complete Streets elements from being eligible for Measure R or M Sub-Regional funding. We strongly believe that would be inconsistent with the intent of Measure R and Measure M Ordinances which allow wide discretion in the sub-regional programs. The guidelines should be permissive, not restrictive.

Thank you for considering our comments. We look forward to continuing to participate in the process to develop more modern and expansive Measure R and M guidelines for the Sub-Regional programs.

Sincerely,

Olivia Valentine, Chair
South Bay Cities Council of Governments

c.c.: SBCCOG Board of Directors
Metro Board of Directors