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December 15, 2020

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.

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita  
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills  
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

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,

A handwritten signature in black ink that reads "Olivia J. Valentine". The signature is written in a cursive, flowing style.

Olivia Valentine, Chair  
South Bay Cities Council of Governments

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