



**Board Report**

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**File #:** 2021-0008, **File Type:** Policy

**Agenda Number:** 15.

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**PLANNING AND PROGRAMMING COMMITTEE  
MARCH 17, 2021**

**SUBJECT: MODERNIZING THE METRO HIGHWAY PROGRAM**

**ACTION: APPROVE THE RELEASE OF THE DRAFT REVISED MEASURE R HIGHWAY PROGRAM CRITERIA AND DRAFT REVISED MEASURE M MULTI-YEAR PROGRAMS (HIGHWAY SUBFUNDS) GUIDELINES**

**RECOMMENDATION**

CONSIDER adopting the recommendations to modernize the Highway Program and approving the release for public review:

- 1) REVISED Measure R Highway Program Criteria - Project Eligibility for Highway Operational Improvements and Ramp/Interchange Improvements, shown in Attachment A, and
- 2) REVISED Measure M Guidelines, Section X - Multi-Year Programs (Highway Subfunds), shown in Attachment B.

**ISSUE**

In June 2020, the Metro Board directed staff to circulate the recommendations to modernize the Highway Program, including broadening its mission, expanding funding eligibility, recommitting to the previously adopted Metro Complete Streets Policy, and updating performance metrics. Staff is targeting Board adoption of the Revised Program Criteria and Guidelines at the June 2021 Board meeting.

**BACKGROUND**

The Project Eligibility for Highway Operational Improvement and Ramp/Interchange Improvements, of Measure R Highway Program Funding Strategy, was adopted by the Metro Board at its October 14, 2009 meeting. In May 2014, clarification on Project Eligibility was amended by the Metro Board.

The Measure M Multi-Year Program (Highway Subfunds) Guidelines were adopted by the Metro Board at its June 22, 2017 meeting, as part of the Measure M Master Guidelines.

**DISCUSSION**

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In fall 2020, Metro staff reached out to the Council of Governments to solicit early input/feedback to the Board-proposed revisions to the Criteria and Guidelines. Additionally, staff presented the Board-proposed revisions to the Metro Technical Advisory Committee and the Policy Advisory Committee at their November and December 2020 meetings. At the conclusion of this early and targeted outreach, we received a total of 14 comment letters. Staff summarized those written comments in the attached summary table (Attachment C).

### **DETERMINATION OF SAFETY IMPACT**

The proposed approval will not have any adverse safety impacts on employees and patrons.

### **FINANCIAL IMPACT**

#### Impact to Budget

Approving the recommendations will have no impact on the FY 2020-21 Budget.

### **IMPLEMENTATION OF STRATEGIC PLAN GOALS**

Recommendation supports the following goals of the Metro Vision 2028 Strategic Plan:

Goal 1: Provide high-quality mobility options that enable people to spend less time traveling by alleviating the current operational deficiencies and improving mobility along the projects.

Goal 4: Transform LA County through regional collaboration by partnering with the Council of Governments and the local jurisdictions to identify the needed improvements and take the lead in development and implementation of their projects.

### **ALTERNATIVES CONSIDERED**

The Board could elect not to approve the public release of the Revised Measure R Highway Program Criteria and Revised Measure M Highway Subfunds Guidelines. This is not recommended as the proposed revisions were the result of Board direction.

### **NEXT STEPS**

If approved by the Board, the Draft Revised Measure R Highway Program Criteria and the Draft Revised Measure M Guidelines, Section X - Multi-Year Programs (Highway Subfunds) will be released for public review. Both Guidelines will be posted on the Metro website on April 1, 2021, and there will be a place at the same location for people to submit comments. Following public input and comment, a final revised Program Criteria and Guidelines will be presented to the Board in June 2021 for adoption.

### **ATTACHMENTS**

Attachment A - Recommended Revisions to Measure R Highway Program Criteria

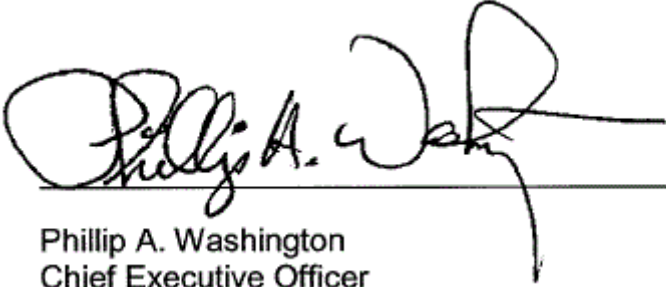
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Attachment B - Recommended Revisions to Measure M Guidelines, Section X - Multi-Year Programs  
(Highway Subfunds)

Attachment C - Summary Table of Comment Letters

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## 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



## Summary Table of Comment Letters

Yes/No to Changes	Comment (Main Points)	Commenting Entity	Board's Response
High Level Summary			
N	Do not apply proposed guideline changes to Metro approved Measure R and M projects	Palmdale, NCTC, San Gabriel Valley, Lancaster, PAC, Gateway Cities COG	Measure R and M projects are in various states of project development and environmental review. These projects are already subject to Metro and/or Caltrans' complete streets policies. The recommendations do not establish new requirements for these projects, but do expand eligibility for some project scope elements. Metro expects that projects that have already completed environmental review or are nearing completion will see little or no change as a result of these guidelines.
Y	Support incorporating multi-modal improvements within a project's scope	Joint ATP Coalition Letter, PAC	Metro provides for the incorporation of multimodal improvements into project scopes via the previously adopted Metro Complete Streets Policy.
N	Do not limit ability to develop capacity enhancement projects	Palmdale, Santa Clarita, NCTC, County of Los Angeles, Lancaster, Gateway COG,	The revised guidelines expand eligibility for multimodal improvements without limiting eligibility for more traditional capacity increasing projects.
N	Do not remove the 1 mile buffer from state highway system	Gateway Cities COG, Palmdale, NCTC, Lancaster	The revised guidelines expand eligibility for projects outside the 1-mile buffer, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
Y/N	Allow for projects outside the 1 mile buffer to be eligible on a case by case basis	Gateway Cities COG, Palmdale, NCTC, Lancaster	The revised guidelines expand eligibility for projects outside the 1-mile buffer, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
Y/N	Projects that reduce VMT should be considered on a case by case basis	NCTC, Arroyo Verdugo, Gateway, South Bay	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.

Yes/No to Changes	Comment (Main Points)	Commenting Entity	Board's Response
Y	Support using VMT as a performance metric	City of Los Angeles, Westside Cities, Joint ATP Coalition letter	Metro agrees with using VMT as a planning metric and will be using it in countywide planning processes as well as when required for project-level analysis.
N	Preserve the intent of the voter approved measures and their objectives of reducing congestion and traffic	Palmdale, Santa Clarita, NCTC, County of Los Angeles, Lancaster, Gateway COG, PAC	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT. The recommendations do not modify the expenditure plans of voter-approved measures.
Y	Support proposed guideline changes	South Pasadena, Westside Cities, Joint ATP Coalition letter	Metro acknowledges the comment.
N	Highway and Congestion relief projects and initiatives are important. Do not limit ability to develop these type of improvements	County of Los Angeles, Gateway COG, NCTC, Palmdale, Lancaster, South Bay	The revised guidelines expand eligibility for multimodal improvements without limiting eligibility for more traditional capacity increasing projects.
N	Urban and Rural needs vary and complete street improvements might not be feasible in all locations of county	County of Los Angeles, NCTC, Palmdale, Lancaster, Gateway Cities	The previously adopted Metro Complete Streets Policy allows for context-sensitive solutions reflecting L.A. County's diverse geography and urban, suburban, and rural contexts. It also includes an exceptions process under specified circumstances.
N	Limit the eligibility of additional multi-modal improvements to the boundaries of highway corridor projects. Implementation of multi-modal improvements at any geographic location should not be permitted.	Gateway Cities COG, Palmdale, NCTC, Lancaster	The revised guidelines expand eligibility for projects outside of highway corridor boundaries, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
Agency Specific Comments			
Do not limit ability to pursue or develop highway capacity enhancement projects		County of Los Angeles	The revised guidelines expand eligibility for multimodal improvements without limiting eligibility for more traditional capacity increasing projects.
Urban and rural geographic areas should be considered when evaluating complete street infrastructure, rural corridors may not be feasible for these type of improvements		County of Los Angeles	The previously adopted Metro Complete Streets Policy allows for context-sensitive solutions reflecting L.A. County's diverse geography and urban, suburban, and rural contexts. It also includes an exceptions process under specified circumstances.

Yes/No to Changes	Comment (Main Points)	Commenting Entity	Board's Response
	Projects currently funded by the Measures should not be impacted by new requirements. This may lead to additional need for studies or redesign	County of Los Angeles	Measure R and M projects are in various states of project development and environmental review. These projects are already subject to Metro and/or Caltrans' complete streets policies. The recommendations do not establish new requirements for these projects, but do expand eligibility for some project scope elements. Metro expects that projects that have already completed environmental review or are nearing completion will see little or no change as a result of these guidelines.
	Add bullet that clarifies Transportation System Management projects that improve roadway operations	County of Los Angeles	Improving roadway operations continues to be eligible under the revised guidelines.
	Add freeway and arterial transportation system projects that improve roadway operations.	County of Los Angeles	Improving roadway operations continues to be eligible under the revised guidelines.
	Retain the wording within one-mile of a state highway; or farther than one mile on a case by case basis to preserve the benefit to highway safety and mobility	Gateway Cities	The revised guidelines expand eligibility for projects outside the 1-mile buffer, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Define what new mode and access accommodations means	Gateway Cities	"New mode and access accommodations" is existing language under the "Multi-Modal Connectivity" program. It is only applicable to the Arroyo Verdugo subregion.
	Retain the wording enhance safety by reducing conflicts. For subregions with high truck volumes this is a critical goal.	Gateway Cities	Under the revised guidelines, "safety improvements" would be eligible in all applicable categories. This language is broadened from the existing language, which only allowed "safety improvements that reduce incident delay."
	Add to guidelines, other projects could be considered on a case-by-case basis as long as a nexus to highway efficiency and operational imp can be shown such as a measurable reduction in VMT or safety improvements.	Gateway Cities	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process. Under the revised guidelines, "safety improvements" would be eligible in all applicable categories.

Yes/No to Changes	Comment (Main Points)	Commenting Entity	Board's Response
	Eligibility of multimodal improvements should be limited to the geographic parameters or boundaries of highway corridor projects. A bus priority or active transportation corridor that is an integral part of a highway project should be eligible.	Gateway Cities	The revised guidelines expand eligibility for projects outside of highway corridor boundaries, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Eligible new projects elements should be limited to major corridors to provide positive mobility relief and not be implemented anywhere.	Gateway Cities	The revised guidelines expand eligibility for projects outside of highway corridor boundaries, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Do not remove the words, "improve traffic flow" from highway improvement program. This language is part of the voter-approved ordinance and ballot language is critical term.	Gateway Cities	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT. The recommendations do not modify the language or expenditure plans of voter-approved measures.
	Both sales tax measures were "sold" by promising to improve traffic congestions. Do not dilute integrity of freeway corridor based plans with broad definitions.	Gateway Cities	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT. The recommendations do not modify the language or expenditure plans of voter-approved measures.
	Measure R and M highway program funding is extremely important to address severely impacted roadways (freeway and highway). Most residents still need a car for basic mobility need and access. Do not diminish effectiveness of	Gateway Cities	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT.
	Highways and Arterials are imperative to mobility and limited alternatives are available to the freeway network. Do not limit ability to develop SR-138 safety roadway enhancements or SR-14 bottleneck improvements.	Lancaster	Measure R and M projects are in various states of project development and environmental review. These projects are already subject to Metro and/or Caltrans' complete streets policies. The recommendations do not establish new requirements for these projects, but do expand eligibility for some project scope elements. Metro expects that projects that have already completed environmental review or are nearing completion will see little or no change as a result of these guidelines.

Yes/No to Changes	Comment (Main Points)	Commenting Entity	Board's Response
	Do not force the study of complete street concepts in areas not viable.	Lancaster	The previously adopted Metro Complete Streets Policy allows for context-sensitive solutions reflecting L.A. County's diverse geography and urban, suburban, and rural contexts. It also includes an exceptions process under specified circumstances.
	While expanding use of highway program funds makes sense in some subregions, do not make the guideline changes at the expense of North Los Angeles County which relies on the scarce highway program funds.	Lancaster	The revised guidelines expand eligibility for multimodal projects, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Do not adversely impact current approved projects in the pipeline	Lancaster	Measure R and M projects are in various states of project development and environmental review. These projects are already subject to Metro and/or Caltrans' complete streets policies. The recommendations do not establish new requirements for these projects, but do expand eligibility for some project scope elements. Metro expects that projects that have already completed environmental review or are nearing completion will see little or no change as a result of these guidelines.
	Do not reduce the strength of these programs to provide congestion relief benefits to our residents.	Lancaster	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT.
	Voter measures with tax increases were justified by allocating funds to improve traffic. do not exclude or restrict ability to improve vehicular traffic.	Palmdale	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT. The recommendations do not modify the language or expenditure plans of voter-approved measures.
	Equitably consider the needs of all jurisdictions impacted by Metro's highway modernization efforts. Do not remove any eligible project opportunities	Palmdale	The revised guidelines expand eligibility for multimodal improvements without limiting eligibility for more traditional capacity increasing projects.
	Do not remove the ability to have projects within a specific distance from a state highway and do not exclude improving vehicular traffic.	Palmdale	The revised guidelines expand eligibility for projects outside the 1-mile buffer, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.

Yes/No to Changes	Comment (Main Points)	Commenting Entity	Board's Response
	Provide flexibility in guideline changes, but preserve the original intent of the voter approved ballot measures.	Santa Clarita	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT. The recommendations do not modify the language or expenditure plans of voter-approved measures.
	Do not force study of complete street concepts or limit ability to spend funds on highway capacity enhancements that Measure R and M intended.	NCTC	The revised guidelines expand eligibility for multimodal improvements without limiting eligibility for more traditional capacity increasing projects.
	Changing Measure R definition to "improve multimodal efficiency, safety, equity sustainability" prohibits intent of Measure R and improving vehicle flow projects don't meet intent anymore.	NCTC	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT. The recommendations do not modify the language or expenditure plans of voter-approved measures.
	Removal of "within 1-mile of state highway" negatively impacts existing projects.	NCTC	The revised guidelines expand eligibility for projects outside the 1-mile buffer, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Add bike facilities, sidewalk/curb ramps, ped improvements on case-by-case basis.	NCTC	Metro provides for the incorporation of multimodal improvements into project scopes via the previously adopted Metro Complete Streets Policy.
	Allow project sponsors to use metrics and eligibility criteria appropriate to the projects needs and benefits	South Bay	The revised guidelines expand eligibility, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Allow highway projects to be funded that reduce delay on congested streets or that reduce VMT	South Bay	The revised guidelines expand eligibility for multimodal projects and projects that ease congestion by reducing VMT.
	Do not use VMT only performance criteria. Improvement in LOS maybe occur without improving VMT.	South Bay	Metro agrees with using VMT as one of multiple planning metrics and will be using it in countywide planning processes as well as when required for project-level analysis. The revised guidelines expand eligibility, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Support inclusion of complete street elements in a project	South Bay	Metro provides for the incorporation of multimodal improvements into project scopes via the previously adopted Metro Complete Streets Policy.

Yes/No to Changes	Comment (Main Points)	Commenting Entity	Board's Response
	Do not impact the scope, schedule or budgets of approved projects	San Gabriel Valley	Measure R and M projects are in various states of project development and environmental review. These projects are already subject to Metro and/or Caltrans' complete streets policies. The recommendations do not establish new requirements for these projects, but do expand eligibility for some project scope elements. Metro expects that projects that have already completed environmental review or are nearing completion will see little or no change as a result of these guidelines.
	Oppose policy changes that affect already approved projects for this subregion or other subregions.	Arroyo Verdugo	Measure R and M projects are in various states of project development and environmental review. These projects are already subject to Metro and/or Caltrans' complete streets policies. The recommendations do not establish new requirements for these projects, but do expand eligibility for some project scope elements. Metro expects that projects that have already completed environmental review or are nearing completion will see little or no change as a result of these guidelines.
	Local agencies and subregions should retain flexibility to address their local needs.	Arroyo Verdugo	The revised guidelines expand eligibility, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.
	Allow for local agencies and subregions to retain flexibility to use other performance metrics	Arroyo Verdugo	Metro agrees with using VMT as one of multiple planning metrics and will be using it in countywide planning processes as well as when required for project-level analysis. The revised guidelines expand eligibility, but continue to delegate project selection to subregions. Subregions may choose to fund or not fund any individual project based on their own prioritization process.