

Local Return

Comment (Main Points)	Response (Y/N/M/A)	Name
Ride Hailing Services		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Include shared-ride hailing services.	(Y) Guidelines revised	South Bay Cities COG West Hollywood Westside Cities COG
Oppose Local Return Floor		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Oppose any Local Return floor.	(Y) Guidelines revised	American Heart Association Community Health Councils Michael Hayes Investing in Place Safe Routes to School
Local Return Allocation		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Supports the inclusion of the daytime population and employment population in the definition of population for local return allocation.	(N) Not recommended	Culver City West Hollywood Westside Cities COG
Miscellaneous Comments on Local Return		
The language urging the coordination of Measure M Local Return funded projects should be expanded and placed in other guidelines with incentives for inter-jurisdictional coordination.	(M) Final decision to be made by Board on 6/22.	Gateway Cities COG
Use (resident) population for calculating Local Return funding and no minimum allocation.	(Y) Guidelines revised	Las Virgenes Malibu COG
The North County believes that there should not be an "off the top" minimum funding floor for local return.	(Y) Guidelines revised	North County Transportation Coalition (NCTC)
Do not object to the Local Return proposal of \$100,000 annual minimum allocation.	(N) Not recommended	San Gabriel Valley COG
Suggests that the Metro Board of Directors encourage or incentivize entities receiving Local Return funds to spend a portion of the funding on operating and capital projects that improve access and mobility for older adults and people with disabilities.	(Y) Local Return guidelines allow for this use.	Access Services
Bellflower's estimated annual allocation is \$1.1M. Based on the recommendation being made, how will this amount be allocated to Bellflower in FY17-18?	(Y) Response provided	Bellflower
Revise Streets and Roads to include, but not limited to: Repair and maintenance of public roadways, pavement maintenance, slurry and rubberized seals, chip seals, pot-hole repair, pavement rehabilitation, or other pavement preservation treatments, roadway construction or reconstruction, utility undergrounding, curb, gutter, sidewalk, trees, roadway signage, median, parkway improvements, and storm drain systems in connection with any roadway improvements.	(Y) Guidelines revised	Downey
The definition of Active Transportation should be expanded beyond "non-motorized, human-powered mode of transportation..." described in the Local Return section. This specificity excludes other current and future "slow speed" modes and the facilities to improve the safety of their use in public rights-of-way.	(N) Other modes allowed by other sections of guidelines.	Eco Rapid Transit
The language urging the coordination of Measure M Local Return funded projects should be expanded and placed in other guidelines.	(M) Final decision to be made by Board on 6/22.	Eco Rapid Transit
There should be no required set-aside expenditure for any eligible use. The Guidelines language regarding lapsing and reserve fund provisions should reflect the fact that some local agencies will have to bank substantial Local Return funds in order to meet their 3 percent contributions to transit projects.	(N) 3% guidelines allow for default use of Local Return without the need for banking of funds	Los Angeles County Public Works
The Guidelines language regarding lapsing and reserve fund provisions should reflect the fact that some local agencies will have to bank substantial Local Return funds in order to meet their 3 percent contributions to transit projects.	(N) 3% guidelines allow for default use of Local Return without the need for banking of funds	Los Angeles County Public Works
The County does not object to a reasonable, equitable minimum floor to assist small-population cities; however, the other proposed factors would be unfairly detrimental to County unincorporated residents.	(Y) Minimums and other factors not recommended	Los Angeles County Public Works
The Guidelines should not permit sub-regions to aggregate the local return funds of jurisdictions within its boundaries and distributing funds based on a formula of the sub-regions' choice.	(N) Subregional reallocations not prohibited in guidelines	Los Angeles County Public Works
Regarding the Local Return allocation, it is the City's preference that Measure M be implemented as was voted by the people of Los Angeles County (i.e. no consideration for a minimum allocation to smaller cities). Additionally, should a minimum allocation amount be approved, it should be no greater than \$100,000.	(Y) No minimum recommended	Pomona
No objection to \$100,000 annual minimum allocation, however is not in favor of increasing this amount beyond the current recommended \$100,000 minimum.	(N) Not recommended	Santa Clarita Local Transit Systems Subcommittee (LTSS)
Consideration of a \$500,000 minimum funding level for small cities that can demonstrate: 1) they have roads classified as truck routes and bus routes; and 2) they can demonstrate that Measure M revenues collected from the city exceeds the amount it receives in local return. 3.) Cities that do not meet the criteria in A and B above receive funding based on the per-capita formula	(N) Not recommended	Signal Hill Vernon

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Local return allocation for various cities in the county should be used first for locally managed light rail connections to existing metro lines. Light and heavy rail alternatives to highway travel should be the #1 focus for Metro	(N) Cities prioritize projects and programs for funding.	Alexander Barber
A floor for local return should not be set; however, there is also concern that cities will not have enough to perform projects. Therefore, rather than having a five year lapsing requirement, I would change it to five years or \$1,000,000 without Metro approval to create a capital reserve fund.	(N) Not recommended	Hank Fung
Measure M should make Transportation Network Companies eligible for local return.	(Y) If contracted by city for eligible use	Hank Fung
Clarify if new cities incorporated after 2016 are eligible to receive Local Return.	(Y) New cities would qualify	Hank Fung
Encourage Metro and local jurisdictions receiving local return funds to incorporate affordable housing into major capital projects, and to analyze concurrently with the environmental process for any project both the compatibility of the current land use regulations with the goals of the project.	(M) Noted. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.	Joseph Sanderson
Prefer Measure M funding to be used to support efficient, sustainable and effective forms of mobility.	(Y) At city's discretion	Michael Hayes
Since the Local Return funds are managed by the cities and unincorporated areas of Los Angeles and are most flexible in its eligible used, these jurisdictions must be held accountable to fund projects that reflect their community's priorities. We commend LA Metro for prioritizing projects that align with existing community plans and policies - such as Vision Zero and Complete Streets - which provides data-informed and community-driven models for equitable transportation planning.	(Y) At city's discretion	Advancement Project California
Draft guidelines lack clarity on how TOC is defined.	(M) Noted. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.	Community Health Councils
Believe the Guidelines should include strong policies to prioritize equity through Local Return in Transit-Oriented Communities, which includes preserving existing affordable housing, as well as developing more high quality affordable housing.	(M) Noted. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.	Community Health Councils
Provide further guidance on best management practices for delivering multi-benefit Local Return investments; establish performance metric tracking and incentivize improvements. Make sure that all local jurisdictions have sufficient access to information regarding recommended practices for making streets green and complete.	(Y) At city's discretion	EnviroMetro
Provide tools that help jurisdictions identify opportunities for multi-benefit investments, and establish a performance metric tracking system to help them monitor their progress across several indicator areas, such as urban heat and quality of pedestrian and bicycle infrastructure.	(Y) At city's discretion	EnviroMetro
The draft guidelines include eligibility for Transit-Oriented Communities in Local Return, however what this means is not clearly defined. However, Investing in Place supports this holistic approach over traditional Transit-Oriented Developments.	(Y) Guidelines revised to reference Metro TOC policy. Measure M is for transportation. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.	Investing in Place
The Guidelines should 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.	(Y) Guidelines revised to reference Metro TOC policy. Measure M is for transportation. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.	Investing in Place

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<p>We recommend that eligible TOC investments include those that:</p> <ol style="list-style-type: none"> 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. 	<p>(N) Ordinance stipulates specific eligible transportation uses which do not include housing. However, funds could be used for Transit Oriented Communities (TOC). Transportation investments (public transit, first mile/last mile, etc.) that support access to or through TOC or other affordable housing sites are eligible; also, Local Return can fund TOC planning efforts that would link housing to transportation investments.</p>	<p>LA Thrives/Enterprise</p>
<p>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.</p>	<p>(M) Noted. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.</p>	<p>Los Angeles County Bicycle Coalition</p>
<p>Provide further guidance on how cities may use multi-benefit Local Return investments, establish performance metric tracking, and require annual audits.</p>	<p>(Y) Annual audits are required.</p>	<p>Los Angeles County Bicycle Coalition Prevention Institute Valley Industry & Commerce Association</p>
<p>We urge Metro to consider how to use Measure M to create and preserve transit-oriented communities and urge development that does not displace core transit riders and preserves Los Angeles' existing affordable housing while creating incentives to build new affordable housing.</p>	<p>(M) Noted. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.</p>	<p>Neighborhood Housing Services of Los Angeles County</p>
<p>Metro's language on TOCs does not consider housing affordability, which is an essential component of a sustainable future for Los Angeles.</p>	<p>(M) Noted. This issue of TOCs is currently being reviewed for the relationship between affordable housing and transit riders.</p>	<p>Neighborhood Housing Services of Los Angeles County</p>
<p>We encourage the board to emphasize in the Measure M guidelines the possible uses for local return funding, and that these uses include mechanisms to create and preserve affordable home opportunities. We recommend that 15% of local return funding go toward affordable transit-oriented communities.</p>	<p>(N) - Cities have requested maximum flexibility in use of funds</p>	<p>Neighborhood Housing Services of Los Angeles County</p>
<p>Local return funds are available for "street" repair but it's unclear whether the definition of street includes alleys. Please ensure that local return funds can be used for much-needed alley repair.</p>	<p>(Y) All public streets and roads, including public alleys, are eligible</p>	<p>Palms Neighborhood Council</p>
<p>Furthermore, the Guidelines should clearly articulate definitions for any use of terms like "fair" or "equitable" that are not based on advancing social equity, safety, or other policy objectives.</p>	<p>(N) Some terms can't be comprehensively defined</p>	<p>Safe Routes to School</p>
<p>Consider making the Local Return program subject to review by the Independent Tax Oversight Committee.</p>	<p>(Y) It will be</p>	<p>Valley Industry & Commerce Association</p>

ADA/Paratransit and Senior/Student Discounts

Comment (Main Points)	Response (Y/N/M/A)	Name
Public Participation		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Allow for additional public participation, similar to processes proposed in various other investment categories.	(N) - The split allows for the flexibility in funding each of these programs	Advancement Project CA Investing in Place
Miscellaneous Comments on ADA/Paratransit and Senior Student Discounts		
Allow any operator including local dial-a-rides to access funding for ADA.	(N) - Local Dial-A-Rides are eligible for Local Return	Gateway Cities COG
Amend the Allocation Methodology section so that it is clearer what the ongoing split should be between these two worthy uses and that ADA paratransit, which is a federal civil rights mandate that must be funded by the region, is guaranteed a steady, dedicated funding source.	(N) - The split allows for the flexibility in funding each of these programs	Access Services
Add the following language: "Up to 10% of the ADA paratransit funds may also be used for activities that encourage the use of other transportation options (besides ADA paratransit) by older adults and people with disabilities, such as Travel Training and other similar programs in coordination with Metro.	(Y) - Guidelines revised to include Travel Training programs or similar programs as eligible uses	Access Services
Measure M guidelines should be clear that at least 75 percent of the 2% ADA Paratransit/METRO Discounts pot should be dedicated to support ADA paratransit in Los Angeles County.	(N) - The split allows for the flexibility in funding each of these programs	Local Transit Systems Subcommittee (LTSS)
The proposed guidelines would allocate 75% of this 2% for ADA paratransit. I strongly believe this is too much, and too lopsided a distribution. At the very least, the funding through this 2% from Measure M should be a 50-50 split (50% to ADA paratransit, 50% for students/seniors/persons with disabilities to use fixed route).	(N) - The split allows for the flexibility in funding each of these programs. The leveraging of Measure M funds with our current subsidy programs results in a 50/50 split.	Ellen Blackman
I urge Metro to use some of these funds to provide other encouragement and incentives for the use of Metro and possibly other fixed route transit, whether through transit education and training, outreach to the affected groups, and improvements to bus stops and paths of travel to and from bus stops and rail stations.	(Y) - Guidelines revised to include Travel Training programs or similar programs as eligible uses	Ellen Blackman
We recommend clarification on whether the 25 percent for fare discounts is a minimum or a maximum because the language in the proposed guidelines is not clear.	(Y) - Guidelines revised provides for a minimum of 25% for fare discounts and maximum of 75% for ADA Paratransit.	LA Thrives/Enterprise
While we generally support reforming the existing underutilized fare subsidy program to serve more riders, we recommend taking another look at the overall funding proposal, which was not vetted with interested stakeholder groups that represent the affected communities.	(Y) - Guidelines revised provides for a minimum of 25% for fare discounts and maximum of 75% for ADA Paratransit.	LA Thrives/Enterprise
We recommend allowing for up to 1 year to establish sub-guidelines for this investment category to allow for additional public participation, similar to processes proposed in various other investment categories.	(N) - Sub-guidelines are not needed.	LA Thrives/Enterprise
Reconsider the proposed split of these funds (75%/25%) between people with disabilities and seniors/student programs with further input from stakeholders.	(Y) - With the leveraging of Measure M funds, the result is a 50/50 split.	VICA

3% Local Contribution for Transit Projects

Comment (Main Points)	Response (Y/N/M/A)	Name
First/Last Mile Projects		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
More flexibility is needed on what qualifies for the 3% set-aside for the major transit capital projects. There should be consideration for any expenditures that are accrued prior to the 30% plan completion. Additionally there should be consideration for the construction of housing or TOC development adjacent to the stations that provide direct or indirect system benefit such as: enhanced ridership, joint parking, pedestrian amenities, bicycle amenities and enhanced lighting and security.	(N) - To count towards the local contribution all first/last mile improvements must be included in the project cost estimate at 30% final design and consistent with station area plans developed by Metro in coordination with the local agency.	Gateway Cities COG Culver City LADOT Eco Rapid Transit VICA
Local Contribution Cost Share		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Will there be an adjustment for the 3% contribution based upon the profile of the alignment contained within or adjacent to the jurisdiction?	(N) - To the local contribution will be 3% of the total project cost estimate at 30% final design.	Eco Rapid Transit Gateway Cities COG
In-Kind Contribution		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
"In kind" local contributions should include the cost of staff time from the commencement of the environmental phase through the end of the warranty period.	(N) - The Guidelines state; "In-kind contributions are eligible to satisfy 3% local contribution...if calculated in the project cost." Staff time (e.g. plan review, inspection services...) would be eligible if those costs are specifically included in the estimated project costs at the conclusion of 30% final design	San Gabriel Valley COG Westside Cities COG Metro Gold Line Foothill Extension Construction Authority LA County Public Works
Miscellaneous Comments on 3% Local Contribution		
Projects that are determined to "SC" should be exempt from the 3% local contribution particularly when the construction of these projects is deemed to benefit the entire County. The Ordinance dictates that any project savings from "SC" projects goes to fund other "SC" projects, if this were to include a 3% local contribution, it would be unfair to the contributing jurisdiction.	(N) - Benefits to local agency from new stations occur with SC project and the local contribution requirement applies.	Gateway Cities COG
The language for the opt-out provision requires more specificity as to what may be negotiated or what the parameters are for failing to reach "a timely agreement".	(N) - The Ordinance and Guidelines specify the opt-out provision.	Gateway Cities COG
The criteria for local first/last mile investment contributions should be developed in a collaborative manner by MTA in conjunction with the COGs and LA County cities that will bear the responsibility for implementing these improvements. There should be an ability to negotiate, on a case by case basis, an additional transportation project investment after the conclusion of the 30% PE. Flexibility to work with private developers interested in improving station access/safety/security should not be arbitrarily rejected after PE.	(N) - To count towards the local contribution all first/last mile improvements must be included in the project cost estimate at 30% final design and consistent with station area plans developed by Metro in coordination with the local agency.	Gateway Cities COG
"Betterment work" funded by the local agency should be counted towards the 3% local contribution.	(N) - Betterments are defined by Metro Policy and excluded by the Ordinance.	San Gabriel Valley COG
Preliminary engineering (30% plans) need to have language to address projects that have already exceeded this point.	(M) For those few projects that are beyond 30% final design Metro and the jurisdiction will need to enter into an agreement that identifies the amount to be paid.	San Gabriel Valley COG
The Guidelines then exclude local funding of a "betterment" for credit against the 3% local contribution.	(N) - Because the betterments are beyond the project 30% final design and the benefits are limited to third parties, there is no justification to include the increased cost of those betterments in the local contribution.	Westside Cities COG

3% Local Contribution for Transit Projects

Comment (Main Points)	Response (Y/N/M/A)	Name
Any funds that a City spends on any first/last mile and active transportation projects that would improve or support access to a light rail station (or a future light rail station) should be considered as part of the City's 3% contribution.	(Y) - To count towards the local contribution all first/last mile improvements must be included in the project cost estimate at 30% final design and consistent with station area plans developed by Metro in coordination with the local agency.	Westside Cities COG
For projects where station locations are still quite speculative, and the environmental review process has not yet been done, flexibility should be given to local jurisdictions to negotiate with Metro on the amount of contribution and types of contribution.	(N) - Local contribution will be determined at the completion of 30% final design which will be completed with local agency coordination.	Culver City
Allow for a sub-regional authority to participate in the local contribution funding plan.	(Y) – Allowed in the Guidelines.	LA County Public Works
Any 3 percent local contribution amount attributed to an unincorporated County of Los Angeles area shall be an obligation of the Supervisorial District in which the project is located and not of the unincorporated County of Los Angeles as a whole.	(Y) - Allowed in the Guidelines Section VII	LA County Public Works
Additional guidance should be developed to provide a reasonable mechanism for satisfying the 3 percent requirement through in-kind contributions or active transportation and first/last mile investments.	(Y) additional guidance on the application of first/last mile improvement to the 3% contribution is pending and will be completed in 2018.	LA County Public Works
The Measure M Guidelines should not apply to projects which have already concluded preliminary engineering (30% plans) as of the date that the Guidelines are adopted.	(N) - The Guidelines state; "In-kind contributions are eligible to satisfy 3% local contribution...if calculated in the project cost at 30% final design."	Metro Gold Line Foothill Extension Construction Authority
The City of West Hollywood supports the concept that any funds that the City spends on first/last mile and active transportation projects that would improve or support access to a light rail station (or a future light rail station) be considered as part of the City's 3% contribution.	(Y) - To count towards the local contribution all first/last mile improvements must be included in the project cost estimate at 30% final design and consistent with station area plans developed by Metro in coordination with the local agency.	West Hollywood
Opt Out Option – The language for the opt-out provision requires more specificity as to what may be negotiated or what the parameters are for failing to reach "a timely agreement"	(N) - The Guidelines specify the opt-out provision.	Eco Rapid Transit
We encourage the Board to consider exceptions to this requirement when a locality's median household income is below \$50,000 and create a process for them to apply to use County funds to meet their 3% requirement.	(N) – The Guidelines state; "In some cases, principally in smaller cities, the default withholding of 15 year of local return from only Measure M Local Return Funds will be less than a formal 3% contribution."	Neighborhood Housing Services of Los Angeles County

Project Readiness and Eligibility

Comment (Main Points)	Response (Y/N/M/A)	Name
Countywide BRT Expansion		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Countywide BRT Expansion Should Not Exclude Municipal Operators	(Y) Guidelines have been revised for clarity; not limited to Metro.	NCTC Westside Cities COG Santa Clarita
Shovel-Ready and Phase Eligibility		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
The guidelines are unclear what constitutes a "shovel-ready" project. Communities with projects in the pipeline need certainty as to what is eligible for funding. Currently, it is not clear if only the construction itself is eligible or if planning is also eligible. Please clarify those definitions in the final version.	(Y/A) - Guidelines have been revised for clarity. Project Readiness will apply to separate phases of project. Readiness thresholds will be determined for planning, environmental, right of way, and construction, and will be defined as appropriate for each funding category. Administrative procedures will be developed.	LA DOT LVMCOG San Gabriel Valley COG South Bay COG Westside COG Investing in Place LA County Public Works Palms Neighborhood Council Santa Clarita West Hollywood
Guideline Development		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Develop more detailed guidelines over the next year to maximize the program benefits of the Countywide Active Transportation Program. The final guidelines should include a concrete transit equity policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs.	(M/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional criteria will be developed and will be considered as part of the LRTP process.	ACT LA Community Health Councils Investing in Place Los Angeles County Bicycle Coalition Prevention Institute
Performance Measures		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
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.	(M/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional criteria will be developed and will be considered as part of the LRTP process.	Investing in Place Los Angeles County Bicycle Coalition
Miscellaneous Comments on Project Readiness		
Clarification how multi-year, partially funded projects achieve a state of project readiness.	(Y) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Gateway Cities COG
Consideration for project acceleration should also include the potential for a project to be included or to receive funding from special or one-time state or federal programs.	(Y/A) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Gateway Cities COG
Transit Contingency Subfund - It is important that a Contingency fund from net revenues assigned to each mode not result in projects first in line automatically receiving funds, to the detriment of projects slower to develop.	(Y/A) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Gateway Cities COG
All interchange projects where the PSR/PDS/PAEDs are funded through Measure M must consider Expresslane alternatives according to the Guidelines. What happens if an Expresslane is found to be feasible and desirable but costly (right-of-way acquisition). How, or will, it be advanced or funded to construction?	(Y) - Some Program Eligibility areas will have competitive elements. Guidelines have been revised for clarity. For others COG 5 year plan process, and additional procedures will be developed.	Gateway Cities COG
The definition of Active Transportation should be expanded beyond "non-motorized, human-powered mode of transportation..." described in the Local Return section. This specificity excludes other current and future "slow speed" modes and the facilities to improve the safety of their use in public rights-of-way.	(M) - Some Program Eligibility areas will have competitive elements. Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Gateway Cities COG

Project Readiness and Eligibility

Comment (Main Points)	Response (Y/N/M/A)	Name
2% System Connectivity Projects (Highway) states that; "The Measure M Expenditure Plan already includes the 1-710 South Phase 1 and 2 and the 1-105 Expresslane Projects which are to be funded with the Highway 2% System Connectivity Program." Of the two projects, only the 1-105 Expresslane project is actually designated as a "SC" project. Is the intention to make the 1-710 phases compete with other projects for the 2% System Connectivity Projects, or is the 1-710 a "major project" assigned to the Gateway Cities Subregion that accrues revenue over time and as project component pieces are ready? Or is the 1-710 project eligible for both? Will the 1-105 Expresslane Project and the 1-710 compete for funding?	(M) - I-710 is a major project. The Expenditure Plan identifies funding and timing for all major projects and programs. I-105 is fully funded in the Expenditure Plan. If I-710 scope is not fully funded it can compete for additional SC funds.	Gateway Cities COG
Visionary Project Seed Funding - The applicant pool should be expanded to include cities, COGs and groups of cities as well as organizations that chose to partner with a government entity to develop or present a visionary project. The match be reduced to 20% and allow for in-kind contributions including staff.	(N) Some program eligibility areas will have competitive elements. Plan process, criteria and additional procedures will be developed.	Gateway Cities COG
The Draft Guidelines regarding Subregional Equity Funds should not allow MTA to meet its obligations using "any combination of federal, state or MTA controlled funds including, but not limited to, Measure M."	(Y) Debt service is considered as part of cashflow for all capital. (M) Metro will seek concurrence on fund combinations.	Gateway Cities COG
Regional Rail, the only area where specific program standards are required for the support of the additional 1% regional rail funding allocation. The guidelines do not recognize the multi-county nature of SCRRRA but impose specific performance measures that presumably the agency must comply with in order to receive the funding.	(Y) - Clarity provided on regional rail performance.	Gateway Cities COG
Similar to Measure R, the Measure M guidelines should include some protection for funds within a subregion and for transfers between transit and highway subfunds. Due to the subregional equity intended to be built into the measure, it is important that funds assigned to a subregion stay within that subregion when reassigned to other projects.	(Y) - Funds assigned to a subregion will stay within the subregion	North County Transportation Coalition (NCTC)
Clarify Funding Source for I-10/Robertson Improvements	(Y) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Westside Cities COG
Add Local Transit Service to First/Last Mile Eligible Projects	(N) Must be capital per the Measure M Ordinance.	Westside Cities COG
The subregional Equity Funds should be made available to all the subregions, when the funding for the San Fernando Valley sub-regional equity project becomes available.	(Y) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Culver City
Projects under the Subregional Equity Fund category should be developed by the subregions (COGs). The guidelines should not impose any special project readiness or local contribution requirements for these funds.	(Y) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Culver City
Visionary Project Seed Funding: this is a laudable expenditure of funds and also verification that Measure M funds can be used for more than capital expenditures. The match should be reduced to 20% and allow for in-kind contributions including staff.	(M) - Additional procedures and criteria will be developed.	Eco Rapid Transit
The final guidelines should 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.	(M) - The intent of Complete Streets Policy is broadly applicable to future funding programs. Subsequent detailed program guidelines will consider specific applicability.	LADOT Safe Routes to School
The purchase of land for parking off of PCH would result in improved regional mobility, traffic flow, trip reliability, travel times and enhanced safety which by definition should qualify the project for Highway Efficiency and Operational Improvements funding. Add "the purchase of land or parking lots to improve safety and mobility" under the list of eligible projects for Highway Efficiency and Operational Improvements funding.	(M) - Acquisition of property/right-of-way must be financially reasonable and proportional to the cost of the project. A Benefit/Cost analysis will be required by Metro and shall be submitted by the City to support feasibility of the project. In subregional projects, Metro will determine the feasibility of the project and justifiable expenditure of Measure M funds. The COG will ensure the expenditures, if approved by Metro, are within the City's allocation.	Malibu

Project Readiness and Eligibility

Comment (Main Points)	Response (Y/N/M/A)	Name
We ask that Metro consider that the regional rail system's ability to perform according to the guidelines is affected by: <ul style="list-style-type: none"> • Metro contributions to maintenance and rehabilitation over time; and • Metro requests related to service (e.g., certain types of service may affect farebox/revenue recovery) 	(Y) - Considered and agreed.	MetroLink
Expand eligibility in the Active Transportation Program to explicitly include investments in programmatic and non-infrastructure activities, such as safe routes to school. Metro recently completed a robust Safe Routes to School Pilot Program to initiate and help sustain safe routes to school programs at ten schools across Los Angeles County.	(N) - Measure M program funds are eligible for capital and specified pre-development activities.	Safe Routes to School
Set aside money within the Countywide Active Transportation Program for ongoing Metro program needs, including safe routes to school non-infrastructure programs. While the 2% dedicated local funding for walking and biking through Measure M is a significant milestone, the amount falls well short of the need, especially in underserved communities.	(M) - Note that Active Transportation is pending detailed program guidelines	Safe Routes to School
Funding Plan, Community/Council Support: The Local Agency should not have to identify a match fund source in their Capital Improvement Program until the year the Local Agency is prepared to award the project.	(Y) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Santa Clarita
Regional Rail: The City supports the increase the allocation from 1% to 2% beginning in 2039.	(Y) - Guidelines reflect the increase in allocation subject to Board evaluation and consideration	Santa Clarita
Eligible projects for Greenways and Green Streets: projects should be connected or germane to some type of travel and not detached park or open space improvements.	(Y) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Santa Clarita
Metro Active Transportation 2% does not directly indicate that funds will be available to all jurisdictions for bike share programs. Can you clarify who will be able to receive these funds?	(M) - Note that Active Transportation is pending more detailed program guidelines, that bike share capital will be eligible, and procedures to access funding to be determined.	Santa Clarita
The Guidelines for TOC local return funding should 1) have equity and affordability as an explicit goal and 2) expand potential Transit Oriented Community (TOC) investments to include the preservation of existing affordable housing near transit. Affordable housing preservation strategies are critical to ensuring existing transit dependent residents can remain in TOCs and will likely be able to reach more units and residents than a production strategy with the same funding level could.	(Y) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	ACT LA
The final guidelines should avoid distributing funding to any program on a "first come, first served" basis. Many of the most needed projects are in communities that do not have the capacity to jump to the front of the line; however the inclusion of authentic community engagement and a data-driven prioritization process can ensure that the most effective projects are identified.	(Y) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed, including community engagement.	Community Health Councils
First allocate stable funding for ongoing Metro countywide program needs. Next, Metro should target assistance to planning and project development in disadvantaged communities to help level the playing field in terms of resources for active transportation as well as to increase the region's competitiveness for state and federal funding programs. Finally, Metro should focus its limited resources on supporting innovative pilot projects that can advance the state of the practice for active transportation projects and programs in Los Angeles County.	(M) - Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Community Health Councils Investing in Place
Include recreational transit eligibility in all operations subfunds. This includes transit service to parks and open space. Recreational transit is only named as an eligible expense in the Local Return section; however, other subfunds that support transit service expansion should also explicitly allow recreational transit service	(M) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Los Angeles County Bicycle Coalition
All subregions should conduct a transparent process for prioritizing additional funding from the Subregional Equity Program with robust public participation. Before allocating any Subregional Equity Program funding, Metro should work with each subregion to identify which projects and programs are priorities.	(Y) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Los Angeles County Bicycle Coalition
All projects and programs funded with Measure M funds must prioritize pedestrian and bicycle safety. The Guidelines should support Vision Zero policies pursued by jurisdictions throughout Los Angeles County.	(M) - Guidelines have been revised for clarity, a 5 year plan process, and additional criteria will be developed.	Joseph Sanderson Safe Routes to School
Expand eligibility to include funding for planning, community participation, and non-capital activities. The Guidelines should clarify eligibility for a range of programmatic and non-infrastructure solutions that are cost-effective and often equally as impactful as capital projects.	(Y/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional criteria will be developed.	Safe Routes to School

Project Readiness and Eligibility

Comment (Main Points)	Response (Y/N/M/A)	Name
Prioritize current Metro policy objectives that support strategic and equitable investments and do not rely on project readiness. Projects should be selected based on the project quality, ability to address inequity, and the impact on objectives such as safety, connectivity, and input received via thorough community engagement.	(M) These considerations will be part of the Long Range Transportation Plan Process	Safe Routes to School
Encourage Metro to pursue projects that include all of the identified BRT features in order to maximize improvement in travel time and customer experience. Include DASH and private shuttles as eligible to use BRT lanes.	(M/A) The development of the BRT study will help determine priorities.	VICA
Ensure that Metro's "Operation Shovel Ready" pipeline leverages new public and private funding opportunities and competitive timelines.	(Y) Alternative funding opportunities are allowed where appropriate.	VICA
Countywide Bus Rapid Transit Expansion (Page 5) Include "Earlier projects coming in under budget" as an event that could trigger acceleration of other projects.	(M/A) The development of the BRT study will help determine priorities.	VICA
Contingency Subfunds (Page 17) Support the use of these funds to allow for advance work on projects listed.	(N) See Section VII	VICA
Support Metro's active transportation program and integration with first/last mile policies. Consider providing an incentive for those programs which assist seniors.	(M/A) note that Active Transportation is pending more detailed program guidelines, that bike share capital will be eligible, and procedures to access funding to be determined.	VICA

Multi-Year Subregional Programs

Comment (Main Points)	Response (Y/N/M/A)	Name
Parity of MSP Funding		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Sub-regional capital funds should not be considered subordinate obligations that are conditionally programmed funding after Metro Administration, Transit Operating & Maintenance, and Local Return/ Regional Rail Sub-fund needs are met. COGs should also be allowed to use Sub-regional funds to assist lead agencies in preparing project applications for any applicable federal, state and regional transportation grant programs that are consistent with Measure M eligibility requirements. Projects be funded through Measure M for project development and delivery and be prioritized and sequenced for Measure M and other matching funds. MSPs should have the same priority for programming as the other primary funding categories listed in the Ordinance.	(Y/M) Consistent with the Ordinance's assignment of funding purposes to capacity subfund account, the availability of funds for MSP investment is prioritized equal to the other Highway and Transit Capital subfunds. Actual disbursements of capital funding irrespective of subfund is subject to Cash Flow policies established in the Guidelines.	Gateway Cities COG Las Virgenes-Malibu COG South Bay COG
MSP Subregional Planning Process		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Need a project development process (5 year), including public outreach, that allows for new projects and revisions to projects previously submitted that involves the subregions.	(Y) A new process has been inserted in to the Guidelines to coordinate project within the framework of five-year plans. Plans will be developed in each MSP in the Expenditure Plan to ensure accountable and responsive subregional project identification, selection and delivery and will include meaningful public outreach.	Gateway Cities COG Las Virgenes-Malibu COG San Gabriel Valley COG South Bay COG Westside Cities COG West Hollywood LA County Public Works LA County Public Health Local Transit Sys. Subcom. Investing in Place Advancement Proj. Calif. LA County Bicycle Coalition
Measure M Funding for Development of Subregional Project List		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Allow subregions to use Measure M MSP funds to develop sub-regional five-year plans.	(Y) - Guidelines have been revised to allow up to 0.5% of MSP funding per year, per individual MSP program for program development by the subregion.	South Bay COG Westside Cities COG LA County Public Health LA County Public Works Investing in Place
MSP Funding Debt Service		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
There needs to be consideration for debt service to support the delivery of MSP programs. The Guidelines should ensure that Metro will not approve loans without prior COG approval and that such approval will not be unreasonably withheld by the COG or Metro.	(Y) Metro can bond per the Cash flow (Section VI) of the Guidelines to address any MS cashflow needs in aggregate. However bonding authority is retained by Metro.	Gateway Cities COG Las Virgenes-Malibu COG San Gabriel Valley COG South Bay COG Westside Cities COG Eco Rapid Transit
Project Readiness		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Metro and the COG should review project applications and clarify any items necessary with the project sponsor to determine project readiness and eligibility for pre-construction or construction activities. Authorization to proceed should require concurrence of the COG and Metro Board of Directors. Smaller jurisdictions may have difficulty advancing projects for competition under the existing MSP project readiness standards.	(Y) COG will be consulted and coordinated with in selection of projects and in shifting funds for projects and programs. Local Return funds can be used to implement transportation planning efforts	Gateway Cities COG South Bay COG American Heart Association Santa Clarita Bike Coalition VICA
Project Sponsor and Local Match		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Sub-regional projects should not require a project sponsor match.	(Y) Does not require, but supplemental funds may be needed where funding is insufficient.	Gateway Cities COG South Bay COG LA County Public Works
Subregional Equity Funds		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		

Multi-Year Subregional Programs

Comment (Main Points)	Response (Y/N/M/A)	Name
Projects under the Subregional Equity Fund category should be developed by the subregions (COGs). The guidelines should not impose any special project readiness or local contribution requirements for these funds. Project sponsors or subregions may choose to leverage Subregional Equity funding with other grant sources.	(Y) - Section XIX of the Guidelines clarifies funding availability and allowed uses.	Gateway Cities COG South Bay COG Westside Cities COG San Gabriel Valley COG Culver City LA County Public Works Eco Rapid Transit Investing in Place
Purchased Transportation Services		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Include acquisition of contracted transportation services required for the service delivery associated with the capital acquisition identified by the subregions. This approach is similar to that which is identified in the Federal Transit Administration (FTA) 5310 Traditional Capital Grant Program.	(Y) - Direct costs associated with the purchased transportation services needed to support a capital project is define as eligible in Section XIII of the Guideline	Local Transit Systems Subcommittee (LTSS) Pasadena West Hollywood
Changes to Measure M Guidelines and Subregional Boundaries		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
The Draft Measure M Guidelines allow the Metro Board to change the Subregional boundaries starting in 2047. Concurrence from the sub-regions should be required before the Guidelines or subregional boundaries are changed.	(M) - The amendment process is defined in Section III of the Guidelines which included public noticing.	Las Virgenes-Malibu COG San Gabriel Valley COG Westside Cities COG Culver City
First/Last Mile and TDM Eligibility		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
The First/Last Mile Measure M Guidelines should include as eligible programs, strategies that eliminate trips or support ridesharing.	(M) - As individual FLM plans and projects are developed, some TDM strategies may be considered.	South Bay COG Westside Cities COG Investing in Place Community Health Councils
Complete Streets and Safety Projects		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Metro's Complete Streets Policy is the primary mechanism for implementing this vision, yet the draft guidelines are vague about its applicability to some programs. The final guidelines should clarify that Metro's Complete Streets Policy applies to all funding programs, including multiyear sub-regional programs, and define Metro's oversight role to ensure compliance.	(M) intent of Complete Streets Policy is broadly applicable to future funding programs. Subsequent detailed program guidelines will consider specific applicability. The Guidelines as drafted consideration safety policies and best practices.	LA County Public Health Community Health Councils LA Thrives/Enterprise
Recreational Transit Eligibility		
<i>Multiple parties, as noted, presented comments related to the topic summarized below; with the accompanying response</i>		
Include recreational transit eligibility in all operations subfunds. This includes transit service to parks and open space, which are otherwise inaccessible to transit-dependent households, resulting in significant disparities in public health outcomes.	(M) - Pending subsequent program guidelines, access improvements to recreational and open space facilities may be eligible in some programs.	EnviroMetro Prevention Institute
Miscellaneous Comments on Multi-year Subregional Programs		
Could the transfer between Capital and Program subfunds affect or be affected by the creation of the contingency fund?	(N)	Gateway Cities COG
Will there be any reconciliation of yearly actual receipts within the five-year estimate of the cash flow model?	(M/A)	Gateway Cities COG Eco Rapid Transit
Develop a schedule for the creation of the outstanding guidelines and continue to engage all stakeholders in developing the individual guidelines.	(Y) - Appendix D of the Guidelines includes a timeline for developing the Administrative Guidelines	Gateway Cities COG
The SR-91/1-605/1-405 (1-605 Hot Spots) is a major transportation initiative (\$590 million allocated) under Measure R and a Multi-year Subregional Program (MSP) under Measure M, with an allocation of \$1 billion over 40- years.	(Y) - These projects are addressed in the Guidelines in Section X	Gateway Cities COG
All interchange projects where the PSR/PDS/PAEDs are funded through Measure M must consider Expresslane alternatives according to the Guidelines. What happens if an Expresslane is found to be feasible and desirable but costly (right-of-way acquisition). How, or will, it be advanced or funded to construction?	(M/A) Section X	Gateway Cities COG
Metro should only program Measure M funds for the "Subregional Equity Fund" program.	(N) Fund availability is clarified in Section XIX	Las Virgenes-Malibu COG
The definition for eligible uses for the "Highway Demand Based Program" should include park and ride facilities, as well as other ridesharing related facilities.	(M/A)	Las Virgenes-Malibu COG

Multi-Year Subregional Programs

Comment (Main Points)	Response (Y/N/M/A)	Name
The LVMCOG recommends that this term “pre-construction” be expanded to “planning and programming studies.” Adding the term “programming studies” will allow the Subregions through their respective COGs to develop Subregional project lists, and for subsequent project development and delivery. This will ensure that proposed projects complement each other and improve congestion and safety.	(M) Measure M is capital, not for project applications or entire life of project, but may be able to add additional project development costs.	Las Virgenes-Malibu COG
Project readiness is a critical factor in accessing funding under Measure M. The NCTC believes these guidelines should more adequately define project readiness for each phase of a project. In particular, the Multiyear Subregional Programs should have additional flexibility to ensure subregions can accomplish the various pre construction phases including environmental review, project design, and right-of-way acquisition with Measure M funds.	(Y) - Project readiness is fully described in the guidelines. At the on-set of projects, the project sponsor should identify the project schedule. Help will be available from metro and Caltrans. Once a reasonable schedule is set, the project will be expected to stay on that schedule.	North County Transportation Coalition (NCTC)
The "Arterial Street Improvements" multiyear subregional program for the North County, defined on Page 29 of the guidelines, should be adjusted to allow intersection treatments such as traffic signals and roundabouts. This subregional program should also include the ability to integrate complete streets concepts into arterial projects.	(M/A) 5 year plan process will be further developed. Recommended that project sponsors consult Metro staff early on to ensure the project is eligible for Measure M funds.	North County Transportation Coalition (NCTC)
Several programs lack sufficient definition to ensure subregions will be adequately able to compete for funds.	(M) note that Active Transportation is pending more detailed program guidelines, that bike share capital will be eligible, and procedures to access funding to be determined.	North County Transportation Coalition (NCTC)
Pre-construction activities are defined in the guidelines and include “planning studies”. SGVCOG recommends that this term be expanded to “planning and programming studies” to develop sub-regional project lists for corridor planning and coordination.	(N) Metro needs to retain bonding capacity for the entire Measure M Expenditure Plan. (Y) Metro will work with each impacted city to receive concurrence if federal funds are used for projects.	San Gabriel Valley COG
Do not allow Metro the ability to unilaterally determine the “Sub-Regional Equity Fund” to be met with something other than Measure M.	(N) Fund availability is clarified in Section XIX	San Gabriel Valley COG
“Highway Demand Based Program” should include park and ride facilities, as well as other ridesharing related facilities.	(M/A)	San Gabriel Valley COG
COGs and lead agencies need assurance that Metro will allow projects to have the funding that they need to proceed from development to delivery.	(M) Measure M is capital, not for project applications or entire life of project, but may be able to add additional project development costs.	South Bay COG
Metro should hold the sub-regions accountable for complying with the ordinance but it should not establish criteria beyond those needed to ensure legal compliance with the ordinance.	(Y) – needed to balance Expenditure Plan, but will coordinate with agencies.	South Bay COG
Sub-regions should be able to use Measure M funding for the entire life of a project—to develop sub-regional project lists, for corridor planning and coordination, and for subsequent project development and delivery.	(M) Subregional programs are not new developments and are similar to those set up in Measure R. Measure M has performance commitments for voters. Subregion cannot have sole purview.	South Bay COG
The Measure M Guidelines regarding Sub-Regional Equity funds should not allow Metro to meet its obligations using “any combination of federal, state or Metro-controlled funds including, but not limited to, Measure M. The guidelines need to require the agreement of the affected COGs that they can accommodate the requirements of funds from other sources. Borrowing or bonding against future Measure M revenues to fund the Sub-Regional Equity Funds should be considered in keeping with the ordinance directives.	(N) Fund availability is clarified in Section XIX. Concurrence is included. (Y) Metro can bond per Cash flow Section VI.	South Bay COG
The Visionary Project Seed Funding Guidelines should recommend that funding in this category be made available to any organization that presents a visionary project idea. The match should be no more than 20% and the Guidelines should allow for in-kind contributions including staff efforts by all partners to be counted toward the match.	(M/A)	South Bay COG
The Multi-Year Sub-Regional Programs (MSPs) commitments need to have the same priority for programming as the other primary funding categories listed in the Ordinance.	(Y) - Subject to the Cash flow Management Section VI	South Bay COG
COGs and lead agencies need assurance that Metro will allow projects to have the funding that they need to proceed from program development through project delivery.	(Y/A) Part of the 5 year plan process that requires further administrative development	South Bay COG

Multi-Year Subregional Programs

Comment (Main Points)	Response (Y/N/M/A)	Name
Cost Containment Policy for Expenditure Plan Major Projects What about scope changes? Standards change with time. There are safety, code, or statutory requirements that change and must be implemented on a project while in construction.	(M) This policy is for fund management for Measure M projects and applies to a variety of cost increases	Caltrans
If the project has both Measure R and Measure M funds will two logos be required or a combined logo?	(Y) - Combined logos should suffice	Caltrans
Will the Independent Audit Firm only be auditing Metro's files and/or agency files? Will all agency projects be audited every year?	(Y) - Metro will audit all Measure M expenditures per agreement.	Caltrans
Delete in Sections A – F (missing F) all instances of "State of good repair, maintenance and/or beautification projects are not eligible for Highway subfunds." Other than beautification, state of good repair and maintenance should be allowed under Measure M:	(N) - Measure M funds are intended for investments that would improve mobility on the State highway system and major arterials in Los Angeles County	Caltrans
"Capital Improvement Expenditures" means expenditures for the purpose of acquiring, upgrading, or maintaining transportation physical assets such as property, transportation facilities, rail improvements, highways, or equipment, so long as any such expenditures for maintenance substantially extend the useful life of the project."	(A) Administrative procedures will be developed within 6 months of adoption of the Guidelines	Caltrans
We strongly encourage Metro to establish improved roadway safety as the primary objective of the Measure M Multi-Year Subregional Programs (MSP). It funds a diversity of projects that provide sub-regional benefits. Whether a project's primary purpose is to improve goods movement, signal synchronization or a new bikeway, it should be engineered to improve safety for all users, especially the most vulnerable roadway users, pedestrians.	(Y) Guidelines as drafted contain consideration safety policies and best practices, and can be delineated further in subsequent detailed program guidelines	County of Los Angeles Public Health
Maintenance and expansion of green infrastructure definition. A This is especially imperative for low-income communities who are typically transit-dependent and have disproportionately less greening elements in their communities. These green infrastructure elements should be multi-benefit, delivering not only environmental results, but also enhancing the community experience of that space.	(M)	EnviroMetro
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.	(M) These considerations will be part of the Long Range Transportation Plan Process	EnviroMetro
Metro's Complete Streets Policy is the primary mechanism for implementing this vision, yet the draft guidelines are vague about its applicability to some programs. The final guidelines should 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.	(M) intent of Complete Streets Policy is broadly applicable to future funding programs. Subsequent detailed program guidelines will consider specific applicability.	Investing in Place
MSP funds should be allocated through a competitive grant program administered by Metro through a Call for Projects-like process tied to the five Measure M objectives. Depending on the size of the program and anticipated award amounts, the program would follow either annual or biennial cycles. All eligible project sponsors in each subregion would be able to apply directly for funding.	(Y/A) - Some MSP areas will have competitive elements. Guidelines have been revised for clarity. For others a 5 year plan process, and additional procedures will be developed.	Investing in Place
The Subregional Equity Program is equivalent to nearly \$1.2 billion across eight subregions, Metro should work with each subregion to identify which projects and programs are priorities for this funding. All subregions should conduct a transparent process for prioritizing this additional funding with robust public participation.	(Y/A) - Some MSP areas will have competitive elements. Guidelines have been revised for clarity. For others a 5 year plan process was added, and additional procedures will be developed.	Investing in Place
Local jurisdictions should have greater ownership of the sub-regional programs. With Metro's support, cities should identify their priorities and specific projects that flow from program level funding in the sub-regional pots. We would welcome the opportunity to create performance measures and specific guidelines for the sub-regional programs to ensure transparent, and strategic investments that support the City's adopted Mobility Plan.	(Y/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	LADOT
The Highway Program should have specific objectives and performance metrics consistent with statewide guidance from the Office of Planning and Research and best practices in planning and evaluation. The guidelines should not rest on outdated metrics as cities and the county evolve current transportation and mitigation programs to align with state law. To ensure consistency across programs, shared metrics should analyze benefits and impacts on public health, sustainability, and social equity.	(M/A)	LADOT

Multi-Year Subregional Programs

Comment (Main Points)	Response (Y/N/M/A)	Name
Reword first sentence to clarify that the list of Subregional programs/projects are identified in an Expenditure Plan to Measure M Ordinance.	(Y) - can clarify Comment is unclear as to amendment process or beyond Exp. Plan horizon.	Local Transit Systems Subcommittee (LTSS)
Funding for projects identified as Major Projects in the Measure M Expenditure Plan should be provided directly from LACMTA to those project sponsors and should not go through a subregional entity, nor require the approval or involvement of any subregional entity.	(M)	Metro Gold Line Foothill Extension Construction Authority
SCRRRA generally supports broad eligibility requirements for programs so that Metro may invest in the regional rail system within Los Angeles County with as many potential sources of funding as possible.	(Y) Agreed	Metrolink
The "Highway – System Connectivity 2%" program should be limited to solely goods movement projects. This should be done concurrently with the development of METRO's Goods Movement Plan.	(M/A) The development of the Goods Movement Strategic Plan will help determine priorities.	Port of Los Angeles/ Long Beach
Metro should continue to think creatively about the role of the Policy Advisory Council and public participation in shaping its policy.	(Y)	Safe Routes to School
The lapsing policy is not consistent throughout the guidelines and should be revisited. A lapsing policy should be included in the adopted guidelines for each Measure M funding category.	(M/A)	Santa Clarita
Allocation Methodology: Clarification is needed as to which date/year will be used for California State Department of Finance estimate. It is recommended that it be the May report of the year of the fund allocation.	(M)	Santa Clarita
The Guidelines should encourage projects to identify during the environmental stage potential policy changes that might enhance the project's goals.	(M/A)	Joseph Sanderson
I've heard that the carpool lanes may require increased ridership to increase the speed to meet federal guidelines.	Inquiry forwarded to appropriate staff.	Karen Olds
Is there any thought to reducing access to hybrid vehicles to help with this regard?	Inquiry forwarded to appropriate staff.	Karen Olds
Use an accurate and comprehensive definition of equity and incorporate equity metrics to identify, select, and prioritize projects.	(M) These considerations will be part of the Long Range Transportation Plan Process	ACT LA
Provide further guidance on how cities may use multi-benefit Local Return investments, establish performance metric tracking, and require annual audits.	(M) for performance and tracking. (Y) Audits required.	ACT LA
We urge LA Metro to create mechanisms that identify and intentionally invest in communities with the highest need - especially those areas that have historically been underinvested and environmentally burdened. Factors like race, income, age, vehicle ownership, susceptible to injury, and exposure to hazardous environmental conditions are strongly linked with access to healthy land use and community design. The guidelines should explicitly support local return investments ensure existing transit dependent residents can remain in TOCs.	(M) These considerations will be part of the Long Range Transportation Plan Process	Advancement Project California
Final guidelines should avoid distributing funding in any program on a "first come, first served" basis. Doing so would miss the opportunity to select the most effective projects based on clearly defined performance measures. The final guidelines should anticipate such a policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance social equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs.	(Y/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	American Heart Association
Supports developing more detailed Active Transportation Program guidelines over the next year to maximize the benefits of this program. We believe this extra year for guidelines development will also provide an opportunity to integrate social equity metrics into this program.	(A)	American Heart Association
The Master Guideline is more an "evolving Framework" where some guidelines are fully articulated (Local Return, Transit Operations) and others are yet to be development. Many of the expenditure details do not currently exist. Over the next year it would be helpful for a schedule to be developed supporting the creation of the outstanding guidelines and continue to engage all stakeholders in the development of the individual guidelines	(Y)	Eco Rapid Transit
Consideration for acceleration should also include the potential for a project to be included or receive funding from special or one-time state or federal programs including those that relate to highways of national significance or primary freight corridors, and for stimulating 3P opportunities	(Y)	Eco Rapid Transit
Transit Contingency Subfund. All Net Revenues allocated to the Transit, First/Last Mile (Capital) Subfund, except those allocated to Metro State of Good of Repair, that are not assigned to a specific project or program coded "T" in the "modal code" column of Attachment A shall be credited to the Transit Contingency Subfund. Creating a Contingency fund from net revenues assigned to each mode may result in projects first in line receiving funds to the detriment of projects slower to develop.	(M/A)	Eco Rapid Transit
Before any Subregional Equity Program funding is allocated, MTA should work with each subregion to identify which projects and programs are priorities for this funding. There is a disconnect between funding projects on a "First come, first serve – project readiness" criteria and mobility benefit.	(M/A) See Section XIX	Eco Rapid Transit

Multi-Year Subregional Programs

Comment (Main Points)	Response (Y/N/M/A)	Name
MSP funds by definition are limited to capital projects. This is followed by criteria that describes project readiness and specified those activities that define construction readiness.	(Y/A)	Eco Rapid Transit
Implement performance criteria for Highway subfunds. If funding pre-construction activities, EnviroMetro strongly recommends that Metro place a cap on the percent of project costs for those activities, as a way to discourage harmful highway projects from using up valuable capital resources that could otherwise be spent enhancing communities. Metro should not explicitly exclude "beautification" from eligibility, as green infrastructure improvements provide beautification co-benefits	(Y/A) Guidelines revised with limits and need for administrative procedures development	EnviroMetro
The definition of the Greenway Network should be expanded beyond routes that are adjacent to urban waterways to also include routes that utilize other existing public right-of-ways, such as utility corridors and abandoned rail lines.	(M)	EnviroMetro
Consider initiating a process to bring previous revenue sources (Props A & C, Meas R) requirements into alignment with Measure M eligibility and performance standards.	(M) Not recommended at this time.	EnviroMetro
The final guidelines should anticipate such a policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance social equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs.	(Y) These considerations will be part of the Long Range Transportation Plan Process	Investing in Place
Support up to a one year extension for Metro staff and the Policy Advisory Council to develop specific guidelines for the Multiyear Subregional Programs. We believe this extension would not meaningfully delay any projects that would be funded by these programs due to the time it will take for sales tax revenues to accumulate in the first year.	(Y/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Investing in Place
Measures like travel time reliability and vehicle miles traveled (VMT) can provide a more accurate representation of the benefits and pitfalls of proposed highway projects than the outdated level of service (LOS). Other metrics should analyze benefits and impacts on public health, sustainability, and social equity. Finally, program metrics should tie to regional performance metrics in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to ensure that projects contribute toward regional goals.	(Y/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Investing in Place
The final guidelines should make safety the first objective for all highway programs, with particular emphasis on people walking and biking. All subregional highway programs should be required 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.	(M)	Investing in Place
Eligibility for highway program funds should be determined with a complete streets approach. The final guidelines should clarify eligibility of streetscape elements, such as pedestrian amenities, shade trees, and green streets, that have functional purposes aside from beautification. As mentioned previously, these programs should also include broad eligibility for TDM programs that complement multimodal infrastructure improvements.	(Y/A) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Investing in Place
The final guidelines should anticipate such a policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance social equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs. We recommend adding language recognizing the anticipated social equity policy and implementation mechanisms to the Administration & Oversight section of the guidelines.	(M) These considerations will be part of the Long Range Transportation Plan Process	LA Thrives/Enterprise
Linking investments to and reinforcing Metro policies and planning (pp.35-36, 41) that are critical to improving access, safety, and sustainability in the transportation system such as the Active Transportation Strategic Plan, First/Last Mile Strategic Plan, Complete Streets Policy, and Countywide Sustainability Planning Policy. However, we see no reason why these policies ought not to inform a wider range of Measure M investments, all of which could contribute to increasing and improving access, safety and sustainability. We recommend making similar references to these plans and policies in other investment categories including Multi-Year Subprograms generally, Highway subfunds, 2% System Connectivity Projects, Subregional Equity Program, and Local Return.	(M/A) Additional administrative criteria will be developed. These considerations will be part of the Long Range Transportation Plan Process	LA Thrives/Enterprise
Expand green infrastructure definition to cooling benefits, do not exclude "beautification" from eligibility, and require multi-benefits.	(M)	Los Angeles County Bicycle Coalition
We encourage you to make reversing declining transit ridership one of the highest priorities for LA Metro in the implementation of Measures R and M, especially in programming the 20% Transit Operations funds in Measure M and in how you use SB 1 transit operations funds.	(M)	Move LA
In the interest of continuing to keep community interests and equity at the forefront of these conversations, we urge the Metro Board to add two members to the Independent Taxpayer Oversight Committee.	(N)	Neighborhood Housing Services of Los Angeles County
Please include steps to ensure that all stakeholders are involved in future guidelines development.	(Y) - Some MSP areas will have competitive elements. Guidelines have been revised for clarity. For others stakeholder a 5 year plan process, and additional procedures will be developed.	Palms Neighborhood Council
Use an accurate and comprehensive definition of equity and incorporate equity metrics to identify, select, and prioritize projects.	(M)	Prevention Institute

Multi-Year Subregional Programs

Comment (Main Points)	Response (Y/N/M/A)	Name
Preserve and expand equitable Transit Oriented Communities (TOCs) by ensuring anti-displacement measures are coupled with transportation investments within the same neighborhood.	(M)	Prevention Institute
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.	(Y/M) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Prevention Institute
Expand green infrastructure definition to cooling benefits, do not exclude "beautification" from eligibility, and require multi-benefits.	(M) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Prevention Institute
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.	(Y/M) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Prevention Institute
All subregions should conduct a transparent process for prioritizing additional funding from the Subregional Equity Program with robust public participation.	(Y/M) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Prevention Institute
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.	(Y/M) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	Prevention Institute
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, expand bus rapid transit corridors in conjunction with road repair and innovative technology. Increase local job and entrepreneurship opportunities and mitigate transit construction impacts for small businesses. Incentivize growth by rewarding high growth areas at each 10-year review cycle. Create an innovative and technologically connected L.A. County.	(Y/M) - Guidelines have been revised for clarity, a 5 year plan process, and additional procedures will be developed.	VICA
Consider having the Independent Tax Oversight Committee also review the Multi-Year Subregional Programs and Local Return funds.	(M)	VICA

Abbreviations:

PAC – Comments came from Policy Advisory Council; Breakout Session abbreviation is added to further categorize comments

ADA – Comments received at ADA/Paratransit, Transit for Elder Adults and Students, Discounts Breakout Session

Y – Yes

N – No

M – Maybe

A – Additional administrative guideline development needed