

Summary Table of Public Comments Received

The table below summarizes and responds to the substantive comments submitted during the public comment period (6/23/23 – 7/24/23) for the Measure M 3% Guideline Revisions.

COMMENT	COMMENTER	RESPONSE	EDITS
General			
We are pleased that the revised local contribution guidelines for future rail projects provides requested clarifications on existing 3% contribution tools to meet our needs, along with new ways for local entities to provide their 3% local contribution.	West Santa Ana Branch City Managers Technical Advisory Committee	Thank you for your comment.	N
The City is pleased to see that the Metro Board of Directors adopted many of the recommendations proposed in October 2022 by the West Santa Ana Branch City Manager Technical Advisory Committee of the Gateway Cities Council of Governments.	City of Artesia	Thank you for your comment.	N
However, it is distressing to see that the revision where Metro can withhold 15 years of Measure M funds if a city fails to reach a timely agreement on the 3% local contribution with Metro remains. ... Measure M funds provide vital financial support to the City's General Fund, especially since it collects minimal property taxes and heavily depends on sales tax revenue.	City of Artesia	The up-to-15-year withholding requirement is included in the Measure M Ordinance and cannot be changed with a revision to the Guidelines. Metro recognizes the importance of local sales tax revenue for cities and is committed to working with jurisdictions to ensure transparency and a workable plan for satisfying the local contribution.	N

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None of the previous transit line projects of similar scale were local cities required to pay a share of the construction costs. While the City understands the funding model has changed with the passage of Measure M, as the last region to receive a large-scale transportation project, it furthers the unequitable distribution of transportation to the region by burdening the WSAB corridor cities with the local 3% match. We respectfully request that cities along the line work with Metro to conduct the required first/last mile improvements near and around the station, and that any funding gaps be requested as part of the federal project funding submission.	City of Artesia	Jurisdictions were required to make local contributions for previous major rail projects. Metro will continue to work with jurisdictions to identify possible funding sources, including first-last mile improvements. However, for Federal grants Metro will need to demonstrate local financial commitment as a prerequisite to receiving Federal funding support. The 3% local contribution is a key component of that local financing.	N
Calculation and Distribution			
The 3% calculation for the local contribution should not include the segments where another jurisdiction has opted to not have a station constructed in their city boundary.	City of Torrance	Per the Ordinance, the local contribution is determined by the percentage of track miles within a jurisdiction's borders for jurisdictions where station construction occurs. Where a jurisdiction has track mileage but no station, that mileage would be extracted from the length of the project prior to determining the percentages for the jurisdictions containing station construction. Per the Ordinance the percentage will be applied to the total project cost at 30% design.	N
No jurisdiction should be required to pay for more than their share of 3% contribution based on centerline track miles within their own jurisdiction.	City of Torrance	Per the Ordinance, jurisdictions with station construction will share the local contribution according to the percentage of track mileage within their borders.	N

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Funding Sources			
The guidelines should recognize in some in-kind capacity the dollar value of the air rights that we would be relinquishing when Metro builds the maintenance yard(s). If they are unwilling to consider this as an “in-kind” contribution towards the 3%, perhaps we can negotiate the air rights into an adjacent development opportunity and use the transaction to pay down the 3% contribution. In either scenario, I hope Metro can recognize the developmental impact of the maintenance facilities	City of Montebello	Metro will work with jurisdictions to evaluate in-kind contributions on a case-by-case basis as the transit project design progresses. Generally, however, credit toward a jurisdiction’s 3% contribution will be given for items that add value, and/or offsets costs, for the Metro project.	N
The City of Torrance also requests consideration for the inclusion of newly constructed transit centers (built by the local jurisdiction) and their amenities to qualify as part of the required three-percent (3%) local contribution for new rail lines and major transit projects.	City of Torrance	Locally led improvements may receive credit if they are included in the project scope and cost by 30% design or are qualifying FLM projects.	N
Timeline/Process			
There is no mention of a proposed time frame as to when a local jurisdiction must start the 3% contribution payment and the length of time the local jurisdiction has to pay off it’s 3% contribution. With no such time frame provided in these proposed guidelines, will each local jurisdiction be subjected to negotiating an individual payback schedule with Metro?	City of Bellflower	These procedural elements remain unchanged and are included in Metro’s publicly available Measure M Administrative Procedures. Payment of the local contribution should begin at the start of construction and end when construction is halfway complete. Metro will work with jurisdictions individually to develop a payment plan that works for both parties.	N