

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.

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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.

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	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.

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	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.

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	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.

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	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.

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	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.