

CITY OF LOS ANGELES

CALIFORNIA

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July 9, 2025

Dear South Bay Cities Council of Governments staff,

Subject: LADOT Comments on Proposed SBCCOG MSP Project Selection Criteria and Local Allocation Program

Thank you for the opportunity to provide feedback on the South Bay Cities Council of Government's (SBCCOG) Measure M Multi-Year Sub-Regional Programs (MSP) Project Selection Criteria and Local Allocation Program, as presented and discussed at the July 9, 2025 Infrastructure Working Group meeting. This letter summarizes LADOT's concerns regarding how these two policy changes deviate from state and regional transportation goals and unnecessarily burden both city and COG staff.

As members of four subregional councils of government, the City of Los Angeles is familiar with the variations between how the subregions allocate MSP funds to their local jurisdictions. The SBCCOG's introduction of a competitive process criteria seems well intentioned, yet creates an undue burden on local agency staff. Subregions like the West Side Cities COG and Central Cities COG divide their MSP funds between their member jurisdictions by a demographic split, like population or service population, without requiring a competitive application process. This not only reduces barriers for city and COG staff, but also creates a predictable funding stream for eligible projects. The SBCCOG's selection criteria favors projects that incorporate staff-intensive processes, such as Synchro analysis, GHG emissions calculations, and community engagement. Synchro analyses and GHG emissions reductions calculations are not typical for projects led by the City of Los Angeles given the shift in State CEQA guidelines, pursuant to SB 743. And while the City of Los Angeles consistently engages stakeholders for major transformative projects, projects that are not transforming the right-of-way would not require intensive engagement.

The SBCCOG's MSP Highway Efficiency Operational Improvement Program (HEOI) and its associated evaluation criteria advance outdated vehicle-centric priorities. The HEOI criteria

prioritize projects that would increase freeway capacity and operational improvements, which promotes roadway widening and increased throughput for cars. Furthermore, the criteria document recommends evaluating these projects based on Level of Service (LOS) metrics that focus on reducing vehicle delay, they reinforce car dependency and lead to more driving. This approach is inconsistent with state and regional goals, including SB 743, adopted Office of Planning and Research CEQA Guidelines, and Metro's Complete Streets Policy, that aim to reduce vehicle miles traveled (VMT), improve air quality, and shift toward sustainable modes of transportation such as walking, biking, and transit.

To align the project selection process with long-term transportation, environmental, and equity goals, we recommend reducing the emphasis on car-oriented performance metrics and placing greater value on multimodal outcomes. Our recommendations include increasing the weighting of the *Environmental Compatibility, Sustainability, and Quality of Life* criteria (currently only 10 of 100 points).

We appreciate the inclusion of the Metro Equity Focused Communities and the CalEnviroScreen Disadvantaged Community indices into the selection criteria to uplift equity needs in the South Bay. Unfortunately, these criteria were added to the *Environmental Compatibility, Sustainability, and Quality of Life* section worth only 10 points, meaning that a project with a substantial sustainability benefit in a high-need community would not be seen as competitive. We strongly recommend a standalone equity criterion that is appropriately weighted to encourage outcomes that dismantle legacy planning practices of the past.

Additionally, the treatment of safety within the criteria is underemphasized and is only one component within the broader *Project Need & Benefit to Transportation System (20 out of 100 points)* category. This category also includes congestion and operational efficiency, which the Office of Planning and Research has determined are not aligned with safety goals. Furthermore, the criteria does not distinguish between safety outcomes for more vulnerable roadway users, such as children, seniors, people walking, or people biking. To better reflect the urgency of state and regional safety goals, we recommend elevating safety as a standalone criterion.

Lastly, we appreciate the Infrastructure Working Group's direction to move away from *requiring* technical analysis when applying for MSP funds, however, the selection criteria still recommends detailed scenario modeling and data analysis that can place an undue burden on applicants, particularly those from smaller jurisdictions, under-resourced communities, and for all over-burdened City staff. Narrative descriptions referencing best practices, case studies, or easily accessible data can effectively communicate a project's value, especially when it comes to improving access, promoting equity, or addressing specific community needs. Reducing all references to technical analysis within the criteria document would make the competitive MSP process more inclusive and accessible to all agencies.

Thank you for considering these comments. We appreciate your continued work to improve the MSP process and support projects that contribute to a more sustainable, safe, and inclusive transportation system in the South Bay.

All questions can be directed to rubina.ghazarian@lacity.org on my team.

Sincerely,

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