

July 13, 2025

South Bay Cities Council of Governments
Attn: Transportation Committee
357 Van Ness Way,
Torrance, CA 90501

Dear SBCCOG Transportation Committee members,

We provide this comment letter on the **Measure M Update item and Multi-Year Sub-Regional Programs Project Selection Criteria** for the July 14, 2025 Transportation Committee meeting. We urge you to **advance comprehensive regional transportation planning to better guide the MSP process** and to **revise the proposed South Bay Measure M MSP Project Selection Criteria** to prioritize public safety, reduce Vehicle Miles Traveled (VMT), lower CO2 emissions, encourage mode shift, and to eliminate the use of Level of Service (LOS).

We find that the process and selection criteria of South Bay Measure M MSP Projects does not reflect a comprehensive planning process and is not as robust as processes followed by other regional councils of governments. We understand the South Bay sub-regional programs are divided into Highway Efficiency Operational Improvement Program (HEOI) and Transportation System Mobility Improvement Programs (TSMIP 1 & 2).

By way of comparison, San Gabriel Valley Council of Governments divides their MSP projects into categories: **Active Transportation, Bus System Improvements, First/Last Mile & Complete Streets, and Highway Efficiency Funds**¹. Their screening criteria is based on project feasibility, regional impact (including safety), and demonstrated support, prioritizing eligible projects listed on the Metro Mobility Matrix, Long Range Transportation Plan, and SCAG Regional Plans². Similarly, the Westside Cities Council of Governments funds projects according to a 5-Year Plan developed from the 2020 WSCCOG Mobility Study completed by their Transportation Working Group and consultant Fehr & Peers which identified **Active Transportation and First/Last Mile Connection projects**³.

Both SGVCOG and WSCCOG processes reflect comprehensive planning that starts with regional transportation plans and awards project funding based on alignment with regional plans and improvements to mobility, safety, and regional integration. We urge you to advance a similar comprehensive regional planning approach to identify priority projects for Measure M funding, rather than a piecemeal city-by-city approach.

The South Bay is in need of a guiding “north star” regional transportation plan. To our knowledge, the South Bay Cities COG has not undertaken such a regional planning process to identify priority projects for Measure M funding. We urge the **Transportation Committee and the COG Board to advance a process to identify long-term regional transportation projects** for a more connected and sustainable transportation system, prioritizing public transit, active

¹ <https://www.sgvco.org/msp-projects>

² https://www.sgvco.org/files/ugd/f815d4_2d944a5824a44b64a2c19bcfe7752f50.pdf

³ <https://www.westsidocities.org/transportation>

transportation, and first/last mile connections. Advocates have developed an example list of [transportation and mobility priority projects](#) for the South Bay with projects such as: Vermont Transit Corridor South Bay, Metro C Line station enclosures, Alameda Corridor freight electrification, J Line bus frequency improvements, bus lanes and BRT planning, I-405 Express Bus, Bicycle Master Plan buildout, and Dominguez channel bike path improvements.⁴

Regarding the South Bay Measure M MSP Project Selection Criteria, we have concerns with the criteria and project priorities they reflect.

Suggested Criteria Changes:

In Mobility/Accessibility Improvement for Users (30 points), which is the largest section, the first two criteria are based on the outdated measures of LOS/ICU. [Since 2013, with the passage of SB 743](#), jurisdictions are no longer required to use LOS in urban areas such as the South Bay⁵. In 2018, California Natural Resources Agency changed its guidelines explicitly stating that, [for the purposes of CEQA, lowering VMT instead of improving LOS should be the most important measure](#)⁶. Thus, using LOS as an Assessment Criteria is outdated and counterproductive, especially when considering grant funding from sources outside of the region.

LOS is an outmoded criteria that sanctioned removing a crosswalk at the intersection of Pacific Coast Highway and Artesia. This resulted in a three-stage crosswalk for pedestrians to travel from the northwest corner to the northeast corner. This pattern is repeated in many intersections across the South Bay. These MSP criteria have enabled the funding of intersection and road widening projects⁷ across the South Bay, which result in increased car over-speeding and puts all road users at risk⁸.

Increasing [roadway crossing exposure upon the disabled](#) for LOS/motorist convenience is a dangerous threat to public safety⁹. [Wheelchair users are especially endangered](#)¹⁰ in addition to elderly pedestrians with slower walking speeds. Safety must be a top priority and reflected in assessment criteria, not an afterthought. This includes adjusting planning practices to adapt to our community demographics: The South Bay faces a “Silver Tsunami” of aging residents. It is imperative to improve safety so people who cannot drive have options to move around safely. Our youth have adopted e-bikes as a main travel mode and it is imperative we build roads for safe movement of bicycles. We understand the need for goods movement, which makes the need for safer road crossings, pedestrian infrastructure, and alternative modes more urgent.

Most glaring in the Assessment Criteria is the criteria that is left out: **there is no mention of safety or reduction in collision and injuries**—only travel time, delay, and incident recovery are mentioned for both HEOI and TSMIP. In contrast, safety is central to SGVCOG’s [selection criteria rubric](#), with “Regional Impact-Safety: Project improves access to transit facilities, enhances safety, and

⁴ docs.google.com/presentation/d/1pW-XxnAK_Un_IJC3dH-kYzBwUFENb6Kzi8-XmpSSCEo/

⁵ <https://t4america.org/2016/06/08/california-officially-dumped-the-outdated-level-of-service-metric-your-state-should-too/>

⁶ <https://www.firstcarbonsolutions.com/frequently-asked-questions/what-do-los-and-vmt-mean/>

⁷ <https://www.torranceca.gov/our-city/public-works/pch-and-hawthorne-project>

⁸ <https://www.sciencedirect.com/science/article/pii/S2046043024000340>

⁹ governing.com/transportation/disabled-people-are-dying-in-americas-crosswalks-we-need-to-protect-them

¹⁰ <https://bmjopen.bmj.com/content/bmjopen/5/11/e008396.full.pdf>

corrects unsafe conditions in areas of heavy traffic, high transit use, and dense pedestrian activity where it is not a result of lack of normal maintenance.”¹¹

Reduction in VMT and Greenhouse gases (GHG) is given only 10 points max, in contrast with 30 points for LOS and other improvements for vehicle flow. [Global atmospheric CO2 reached another record high of 422.5 parts per million \(ppm\) in 2024](#)¹² and the rate of increase is picking up as the ocean reaches capacity for CO2 absorption. **We suggest adding safety as a criteria and replacing LOS with VMT/GHG reduction.**

Another substantive omission in the Assessment Criteria and Project Examples is the **South Bay Bicycle Master Plan (SBBMP)**. Both Mobility/Accessibility Improvement (30 points) and Regional Significance (20 points) mention the Local Travel Network (LTN) but omit the SBBMP. The LTN routes electric wheelchairs, scooters and bicycles to travel on neighborhood streets, mapping long detours instead of direct routes to destinations. The SBBMP proposes a network of high-quality bike lanes on major streets¹³. The two networks can work in tandem to create an active transportation network, and **we urge the COG to include SBBMP projects in the Project Examples and Assessment Criteria for MSP projects alongside LTN.**

Suggested Project Example Changes:

In addition to adding SBBMP in the Project Examples, we urge additional updates. Many of the Project Examples listed, especially in the HEOI Program, reflect car-oriented infrastructure which worsen GHG emissions, VMT, and safety. This includes: auxiliary lanes, shoulder widening, intersection and street widening, turn lanes, and parking structures. We appreciate that TSMIP Project Examples include complete streets, bicycle infrastructure, and pedestrian infrastructure projects. However, many examples given in the TSMIP Program are difficult to understand and do not mirror active transportation and first-last mile projects funded by other regions. This includes: Intelligent Transportation Systems, Autonomous Vehicle Infrastructure System, and Broadband Regional Connectivity Infrastructure. **Both lists require updating to better reflect projects that would reduce traffic, VMT, GHG, and improve safety.** For HEOI this can include: BRT lanes, express buses on highways, transit center upgrades. For TSMIP this can include: South Bay Bicycle Master Plan/Class IV bike lanes, bicycle highways, and traffic calming infrastructure.

Summary:

Our projects are only as strong as our priorities and our planning processes. The priorities and processes currently reflected by the South Bay COG MSP Project Selection Process do not meet our region's needs for sustainable transportation nor do they integrate with LA Metro long-range plans, SCAG Regional Transportation Plan, or first/last mile needs in the South Bay.

In summary, **we object to the re-adoption of the South Bay Measure M Multi-Year Sub-Regional Programs Project Selection Criteria as written** in the [Agenda Packet for the SBCCOG Transportation Meeting on July 14, 2025](#). In the short-term, the **criteria must be updated to award points for safety, VMT/GHG reduction, and mode shift, and eliminate the use of outdated LOS** (we suggest referring to SGVCOG's [rubric](#)). This will improve

¹¹ https://www.sgvco.org/_files/ugd/f815d4_80a4252e77b94bc4b8f92a9e4c7a8fee.pdf

¹² <https://www.iea.org/reports/global-energy-review-2025/co2-emissions>

¹³ <https://sbbplus.org/sbbplus-master-plan/>



competitiveness for outside grant funding. The **MSP Project Examples must better reflect best practices and proven transportation options**, shifting away from road and freeway widening and embracing bus and bike lane projects. In the long-term, we ask the South Bay Cities COG to **undertake a regional transportation planning process** similar to those implemented by the [San Gabriel Valley COG](#) and [Westside Cities COG](#) to define regional priorities, outline multi-jurisdictional projects, revise Measure M MSP Program types, and update and modernize selection criteria.

Thank you for considering our comments and for your work advancing a safe and connected transportation system in the South Bay. We invite you to contact us at any time.

Sincerely,

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