
Comment Letter for COG Board Meeting - Item 8.D.1 (7/24/25)

From South Bay Forward <southbayforward@gmail.com>

Date Wed 7/23/2025 6:15 PM

To Natalie Champion <natalie@southbaycities.org>

Cc David Leger <davidl@southbaycities.org>; Anne Tsai <annet@southbaycities.org>; rtanaka@cityofgardena.org <rtanaka@cityofgardena.org>; William Uphoff <cc.uphoff@lomitacity.com>; rjackson@hermosabeach.gov <rjackson@hermosabeach.gov>; BSuarezLawndale@aol.com <BSuarezLawndale@aol.com>; Zein.Obagi@redondo.org <Zein.Obagi@redondo.org>; ntarnay@manhattanbeach.gov <ntarnay@manhattanbeach.gov>; lgiroux@elsegundo.org <lgiroux@elsegundo.org>; chicks@carson.ca.us <chicks@carson.ca.us>

 1 attachment (399 KB)

Measure M MSP Selection Criteria - SBFwd LWV Letter.pdf;

Good evening Ms. Champion and South Bay Cities COG Board,

We are providing the following comments on the South Bay Cities COG Board Meeting on Thurs, July 24 for the [agenda listed here](#), pertaining to Item 8.D.1 for Measure M MSP Local Allocation Program Policies and Project Selection Criteria ([link](#)).

At the [July 14 COG Transportation Committee Meeting](#), we provided a comment letter jointly signed by South Bay Forward and League of Women Voters Beach Cities on the Measure M MSP Update and Project Selection Criteria. You can find our letter [here](#) and attached. Our letter and additional letters from the City of Los Angeles Department of Transportation and the South Bay Bicycle Coalition Plus are in the attachments of the transportation meeting on the COG website ([link](#)). Can you include these letters in the attachments of the July 24 Board Meeting for Item 8.D.1?

The three letters provide similar feedback on the Measure M MSP Program and Project Selection Criteria. We appreciate the steps undertaken to update these criteria and receive feedback. In our letter, we provided the following points:

1. The **Project Selection Criteria must be updated** to award points for safety, VMT/GHG reduction, and mode shift, and eliminate the use of outdated LOS (we suggest referring to SGVCOG's [rubric](#)).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 competitiveness for outside grant funding.
2. The **MSP Project Examples can better reflect best practices and proven transportation options**, shifting away from road and freeway widening and embracing bus and bike lane projects. Examples of these project types that can be added include: BRT lanes, express buses on highways, transit center upgrades, South Bay Bicycle Master Plan/Class IV bike lanes, bicycle highways, and traffic calming infrastructure.
3. 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. This will provide a guiding "north star" regional transportation plan to better plan and envision future transportation and mobility in the South Bay.

In their letter, LADOT staff raised similar concerns that the current Project Selection Criteria "advance outdated vehicle-centric priorities" that "prioritize projects that would increase freeway capacity and operational improvements, which promotes roadway widening and increased throughput for cars" including evaluating projects based on the outdated criteria of Level of Service (LOS). They suggest increasing the weighting of Environmental Compatibility, Sustainability, and Quality of Life criteria and uplifting equity for high-need communities and safety for vulnerable road users. They also indicate moving away from requiring detailed modeling and technical analysis on project applications and move towards narratives reflecting best practices.

We provided our comments in-person at the meeting. The Transportation Committee discussed how the Measure M MSP Selection Criteria was formulated and whether the current criteria prioritized safety and equity. There was consensus that a more thorough update of these criteria could be facilitated when the selection criteria is brought back to the Infrastructure Working Group (IWG) via the annual update process. We ask that the **recommendations provided in the letters be taken under strong consideration by the IWG** in the next cycle.

We have summarized the feedback with the following suggested revisions as a starting place and have shared these with Erik Zandvliet (Chair of IWG):

- Consider adding to HEOI Project Examples: BRT lanes, express buses on highways, transit center upgrades, first/last mile projects to transit stations.
- Consider adding to TSMIP Project Examples: South Bay Bicycle Master Plan, Class IV bike lanes, bicycle highways, neighborhood greenways, and pedestrian and traffic calming projects.
- Consider adding to Mobility/Accessibility Improvement for Users (30 points) and Regional Significance, Multi-Jurisdictional Effort (20 points): Mention "South Bay Bicycle Master Plan and city bicycle plans" with mention of LTN.
- For VMT: Add "Reduces VMT" to Mobility/Accessibility Improvement for Users (30 points) or reduce this point category to 20 points and increase the Environmental Compatibility, Sustainability, and Quality of Life category (which includes VMT reduction) from 10 points to 20 points.

- Consider adding to Bonus Assessment Criteria: (From SGVCOG) The proposed project is listed in the Metro Mobility Matrix, the Metro Long Range Transportation Plan, the Metro Strategic Project List, the SCAG Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal Plan), or other adopted regional plans.
- Consider creating standalone categories for Equity and Safety (see LADOT Letter).

Thank you for your responsiveness and willingness to update this process and selection criteria. **We ask that the Board considers these recommendations, especially the need for a regional transportation plan and to prioritize VMT, safety, mode shift, and equity.** We invite you to contact us at any time.

Sincerely,
Brianna Egan
Chapter Chair & Transportation Lead



South Bay Forward
southbayforward.org

We are moving the South Bay LA region forward on housing, transit, and active mobility.

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.sgvkog.org/msp-projects>

² https://www.sgvkog.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 CCOG 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,

Brianna Egan, Chapter Chair & Transportation Lead

Allen Natan, San Pedro/City of LA Lead

South Bay Forward Steering Committee (southbayforward@gmail.com)

Therese Neustaedter

President

League of Women Voters of the Beach Cities (BeachcitiesLWV@gmail.com)

CITY OF LOS ANGELES

CALIFORNIA

LAURA CORNEJO
GENERAL MANAGER



KAREN BASS
MAYOR

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

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,

Tomas Carranza

Tomas Carranza
Assistant General Manager
LADOT

c: Aksel Palacios, Council District 15
Rubina Ghazarian, LADOT
Rachel Junken, LADOT



July 12, 2025

South Bay Council of Governments

Attn: Anne Tsai, Arron Baum
357 Van Ness Way, 90
Torrance, CA 90501

Dear SBCOG Team,

On behalf of the South Bay Bicycle Coalition plus, we are writing to request this letter be shared with your members prior to the agreement on Measure M rubric being settled. We believe the scoring rubric for Measure M funds needs more attention with respect to the growing impact and value from micromobility and Bike Master Plan working to expand use cases and delivering on last mile solutions where 70% now live within 3 miles of work and home.

The SBCOG notes in its report that the implementation of LTN is advancing in certain cities. There's value gained by modeling Measure M with LTN and long-approved Bike Master Plans to expand reach for various users. Automotive economics continues to challenge users with increased cost of ownership. A forward-planning Measure M rubric can outline benefits showing a range of scenarios with different vehicles being implemented.

Additionally, while Measure M rubric focuses on legacy transportation infrastructure shortfalls at highways, evidence exists how changing last mile transit improvements can also generate housing supply with less needed parking and more road sharing. SBCOG can influence these use cases with transit rubrics that reference housing and transit working in tandem.

As a nonprofit, The South Bay Bicycle Coalition plus offers a broad and informed private and retired public residents to help align Measure M goals and recognize transit patterns are changing due to economics, health and sustainable values. We seek input on budgeting rubrics of Measure M funds to progress away from restrictive parking as a prevailing baseline and with respect to developing more functional and balanced travel solutions.

Thank you for your consideration. We look forward to the opportunity to add to a broader discussion on how Measure M funds can complete an already existing Bike Master Plan and provide information to facilitate and deepen user engagement with earned values.

Sincerely,

Rod Kuhns
President

A handwritten signature in black ink, appearing to read "Rod Kuhns", written over a light blue horizontal line.

**The South Bay Bicycle Coalition is designated by the IRS as a 501(c)3 non-profit organization and your donation qualifies as a charitable contribution under the applicable federal tax law.*