



NATURAL RESOURCES DEFENSE COUNCIL



May 20, 2016

Mr. Phillip A. Washington, CEO  
Metro  
One Gateway Plaza  
Los Angeles, California 90012  
via email: [theplan@metro.net](mailto:theplan@metro.net)

**RE: Potential November 2016 Transportation Ballot Measure Draft Expenditure Plan**

Dear Mr. Washington,

On behalf of Investing in Place, the Los Angeles County Bicycle Coalition (LACBC), and the undersigned partners, we applaud Metro's ambitious vision to improve transportation options and the quality of life for Los Angeles County's 10 million residents. The 2016 potential ballot measure draft expenditure plan is a strong foundation for a robust discussion of the region's transportation priorities. Our Los Angeles County transportation system is uniquely dependent on sales taxes, which puts the greatest burden on low-income families. It is essential that their needs are prioritized by any further sales tax increase. Currently, close to 70% of Los Angeles County's freeways, streets, sidewalks, busways, and

bicycle lanes are funded by the previous 3 existing County transportation sales taxes: Prop A, C and Measure R. A new ballot measure has the opportunity to fill in the gaps that the existing measures fail to address.

We have reviewed the draft ballot measure expenditure plan and offer these recommendations, detailed below, to strengthen the plan's benefits and ensure those benefits extend to all — regardless of age, financial resources, or physical abilities:

1. Ballot Measure Needs More Equitable Active Transportation Funding
2. Ballot Measure Should Focus on Providing High-Quality Transit for Riders
3. Ballot Measure Should Promote Innovative Demand Management and Land Use Strategies to Improve Mobility
4. Ballot Measure Expenditures Should be Transparent, Accountable, and Inclusive in its priorities and Respond to Future Needs

Our vision for the potential ballot measure is based on the following principles: connectivity, integration, quality service for transit riders, sustainability, and safe, healthy, and equitable communities. Based on these principles (many of which are aligned with Metro's goals), we believe our recommendations can have an immediate positive impact on ridership and quality of life, and can strengthen our transportation network for many decades to come (For our guiding principles, please see Appendix A).

### **1. Ballot Measure Needs More Equitable Active Transportation Funding**

For the past several years, Investing in Place, LACBC, and our partners have raised awareness of the incredible disconnect between the increasing demand from residents for active transportation and the lack of significant investment in projects that would make our streets safe and comfortable for walking and biking, and getting to the bus stop and train station. For the first time, the draft expenditure plan would address this disparity by creating a dedicated funding stream with local dollars to strategically invest in first and last mile access to bus and rail, safe routes to school, and a regional active transportation network. We applaud Metro for creating a \$600 million regional funding set-aside and the subregions that together allocated an additional \$1.9 billion for active transportation projects and programs. This combined \$2.5 billion is a significant down payment on Los Angeles County's active transportation needs (All funding is in 2015 dollars.)

However, this funding falls far short of the identified funding need and what peer agencies have dedicated to walking and biking. Metro's Active Transportation Strategic Plan projected that between \$11.0 and \$29.5 billion is needed to make Los Angeles County a safe and convenient place to walk and bike. The proposed ballot measure does not even come close to that, and would only satisfy between 8.5% and 22.7% of the identified need. Compared to other California counties, Metro's draft expenditure plan dedicates 6% to active transportation, while Alameda County — the clear best practice — dedicated 12% in its 2014 Measure BB. Metro's draft plan is a good start for creating a multi-modal transportation network, but needs to be better aligned with the Active Transportation Strategic Plan to make Los Angeles County a safe and convenient place to walk, bike, and access transit.

What is most troubling, though, is the disparity among proposed active transportation investments in different subregions. One subregion in particular, the Gateway Cities, is completely left out in the draft plan, despite this subregion including the county's most environmentally impacted communities with significant conflicts between trucks and residents who walk and bicycle. The lack of investment in active transportation in the county's highest need communities, despite consistent support from those communities' elected officials, is a fatal flaw in the draft expenditure plan.

To address the funding gap for active transportation, we recommend a three-prong approach:

1. Clarify and strengthen the applicability of Metro's Complete Streets Policy to all ballot measure funding
2. Include first/last mile improvements in all transit capital projects and
3. Dedicate \$400 to \$500 million (2015\$) for active transportation in the Gateway Cities.

### *Complete Streets*

In 2014, Metro adopted its Complete Streets Policy, which provides for the consideration of the needs of all potential users of every transportation project and specific requirements to accommodate pedestrians, bicyclists, children, older adults, and people with disabilities. While this policy covers all projects in Metro's purview broadly, specific protections for vulnerable populations should be built directly into the measure. By explicitly integrating the needs of people walking and biking into all project scopes, taxpayers and local jurisdictions can avoid expensive retrofits that would be required to meet their needs in future years at much greater cost.

For example, in San Diego County, the TransNet sales tax ordinance includes clarifying language:

*All new projects, or major reconstruction projects, funded by revenues provided under this Ordinance shall accommodate travel by pedestrians and bicyclists, except where pedestrians and bicyclists are prohibited by law from using a given facility or where the cost of including bikeways and walkways would be excessively disproportionate to the need or probable use. Such facilities for pedestrian and bicycle use shall be designed to the best currently available standards and guidelines.*

This language would clarify that all projects funded by the potential ballot measure are in fact required to comply with Metro's current policy and promote the widespread use of the best available standards for pedestrian and bicycle infrastructure across the county.

### *First/Last Mile*

Metro's Complete Streets Policy requires the inclusion of first/last mile improvements in all transit capital projects but, it is our understanding that these costs were not included in the life-of-project budget estimates used to develop the draft expenditure plan. This oversight, in

addition to violating Metro's adopted policy, would result in transit projects that are not well connected to the neighborhoods they are intended to serve. Metro's First/Last Mile Strategic Plan and Active Transportation Strategic Plan provide comprehensive approaches to scoping and estimating the costs for first/last mile improvements at various station types. These plans should be used to generate realistic budgets for first/last mile improvements around all new transit lines included in the potential ballot measure. These estimates should follow FTA guidance to include improvements within a 1-mile walkshed and 3-mile bikeshed of all stations.

Correcting this error will require an increase to all transit life-of-project budgets, which may not be feasible within the confines of the 40-year measure detailed in the draft expenditure plan. However, the 45-year and 50-year alternatives provide an opportunity to increase all transit project budgets by 3 to 5% across-the-board to include first/last mile improvements. This should be the highest priority for new funding made available by a longer measure.

### *Equitable Investment*

Metro's "bottoms-up" process elevated Councils of Governments (COGs) above all other stakeholders, including community groups and local residents. Most COGs took seriously their responsibility to consider input from member agencies and the public, and developed consensus around balanced allocations that reflect local priorities. The Gateway Cities COG, however, did not arrive at consensus on their subregion's priorities due to the COG leadership's unwillingness to accommodate requests from member agencies, community groups, and constituents for active transportation funding. At the February 2016 COG meeting, the board voted narrowly to not allocate dedicated funding to active transportation, despite support for such an allocation from nearly half of the board. At this meeting, over 40 Gateway Cities residents testified in support of funding active transportation — voices that have otherwise been shut out of the process.

Given the high hurdle of a two-thirds vote, Metro has been careful to cultivate support from all parts of the county for this ballot measure. Unfortunately, the Gateway Cities COG's abdication of its responsibility to seek subregional consensus now undermines the broad-based support from elected leaders, stakeholders, and constituents that Metro needs for this measure to succeed. In the absence of leadership from the COG, Metro must work to heal the divisions in the subregion by developing a compromise that does not ignore the most basic mobility needs of the county's most vulnerable communities.

To be consistent with other subregions, between \$400 and \$500 million should be invested in the Gateway Cities subregional Active Transportation Program, which is currently listed as "TBD." This funding could come from reallocating funding from expensive freeway projects like the I-605, or by exploring more innovative options like converting proposed freeway expansion projects into ExpressLanes that would then generate additional revenue in the subregion. At Metro's public meeting in Paramount on April 26th, the straw poll results revealed that active transportation was participants' second highest priority (32%). It was second only to new rail lines (34%) and double the support for new freeway capacity (16%). Metro should respect the voices of Gateway Cities residents who have consistently requested funding for active transportation investments in their communities.

## **2. Ballot Measure Should Focus on Providing High-Quality Transit for Riders**

The draft expenditure plan includes significant investments in preserving and operating the existing transit system, even as it expands to serve new riders. Proposed funding for transit operations and state of good repair are essential for Metro to provide safe, reliable, and convenient transit service. The potential measure would provide additional resources for Metro to invest in corridors with the greatest potential to grow ridership without cutting lifeline service in other areas. The proposed eligibility of operations funding in the early years of the measure for state of good repair is a smart and creative way to prepare existing facilities for an influx of new riders. We support the draft expenditure plan's allocations for transit operations, additional service for students and seniors, and state of good repair and urge Metro to maintain them in the final measure.

The proposed measure also includes important opportunities to enhance service and improve ridership by developing a comprehensive Bus Rapid Transit (BRT) network. Metro has been studying dedicated bus lanes in 10 corridors across Los Angeles County and the City of Los Angeles' Mobility Plan 2035 calls for over 200 miles of new enhanced bus service along dedicated lanes. These are relatively quick and cost-effective improvements that would have tremendous benefits for existing bus riders and attract new riders with faster and more reliable service. The draft expenditure plan includes a phased program with funding available in each decade of the measure. While the specific parameters of this program are yet to be determined, Metro should set a minimum definition of service frequency and infrastructure elements to ensure that this program delivers on its potential with high-quality BRT projects. At a minimum, projects funded by this program should include dedicated lanes, all-door boarding, and 12-minute headways throughout the day.

## **3. Ballot Measure Should Promote Innovative Demand Management and Land Use Strategies to Improve Mobility**

The draft expenditure plan aims to provide a balanced set of transportation improvements for everyone, whether they take transit, walk, bike, or drive. In planning for this balanced system, it is important to recognize that all transportation projects affect land use and travel patterns. New transit projects support more concentrated land use, which in turn supports greater ridership, creating a feedback loop of increasing efficiency. Complete streets increase walking and biking in commercial corridors, which leads to more business activity, which then attracts even more people walking and biking. Highway projects also have a well-documented feedback loop: as roadway capacity increases, drivers make more trips and more of their trips during peak hours, filling the new capacity and all but eliminating any congestion reduction benefit of the project.

If travel demand is managed, this negative outcome from highway projects is not inevitable. Los Angeles County has one of the nation's best practices in using pricing to manage freeway corridors to maximize mobility. The ExpressLanes on the I-110 and I-10 freeways provide travel time reliability for drivers, improve frequency for transit riders, and generate revenue that is reinvested in benefits for communities most impacted by the freeways. ExpressLanes are a win-win-win that should be scaled up into a more comprehensive network across the county.

Recent experience with other highway projects, most notoriously the I-405 widening, should serve as a warning for Metro to avoid projects that do not use pricing strategies to manage the new capacity efficiently. The county cannot afford to spend billions of dollars on new freeway capacity with little congestion reduction benefit. There is a role for highway projects as part of a balanced measure, but all new freeway capacity should use pricing to ensure that the freeways don't return to gridlock within just a few years. Specifically, new lanes proposed in the I-5 and I-605 projects should be converted to ExpressLanes, and any additional capacity on the I-710 for goods movement should also be tolled. This would improve these projects' mobility benefits, enable innovative financing strategies to accelerate projects, and free up sales tax revenues for other much-needed projects in the subregion, including active transportation and transit.

Just as important as short-circuiting the negative feedback loop of highway capacity projects is reinforcing the positive co-benefits of transit investment in communities. The draft expenditure plan expands the eligibility of local return to include Transit-Oriented Communities around station areas. This is a smart integration of land use strategies to promote economic development around transit stations, which will increase ridership. These expenditures should also promote affordable housing near transit stations to mitigate any displacement of low-income families and ensure that high-propensity transit riders are able to afford to live near the service they rely on in their daily lives.

The measure also proposes to expand local return eligibility to include "green streets," which will help reduce pollution currently generated by our county's streets and highways, capture and utilize stormwater to reduce our dependence on imported water, and provide opportunities to invest in urban greening projects that will help cool our communities during extreme heat events. Metro should continue to promote the use of the best available standards for green and complete streets that provide safe and sustainable environments for residents. Additionally, Metro should look to collaborate with other agencies to leverage existing planning efforts and policies around stormwater capture, urban cooling, and urban greening to fully realize the potential and impact of green streets in Metro projects.

#### **4. Ballot Measure Expenditures Should be Transparent, Accountable, and Respond to Future Needs**

At a time of incredible innovation in transportation, including shared mobility, automation, and renewed focus on placemaking, the draft expenditure plan attempts to look four decades (or maybe five) into the future to anticipate transportation needs. Long range planning is both essential and challenging amid such a rapidly changing landscape. The draft plan deals with this reality by proposing a number of funding programs with general goals and the flexibility to allocate funding to yet-undetermined specific projects. This approach provides both the vision to describe the benefits of the measure to voters and the flexibility to respond to unknown future needs within that broad vision.

### *Guidelines for Subregional Funding Programs*

The creation of so many subregional funding programs is a tremendous opportunity for cities to work collaboratively to address mobility challenges that aren't confined to city borders. Metro has a role in administering these programs to ensure they are effectively delivering promised benefits and are consistent with regional plans and policies, including Metro's Complete Streets Policy.

In the case of active transportation programs, they still fall short of the estimated funding need for the region, so it is important to leverage these new programs with additional funding sources as well. One opportunity is to require a match from local return, similar to other regional, state, and federal funding programs, to increase the total funding available for these purposes and to incentivize local jurisdictions to propose smart and cost-effective projects.

### *Oversight of Local Return*

Local return is an important revenue source for cities to maintain their local transportation infrastructure. Research by the Safe Routes to School National Partnership and Los Angeles County Bicycle Coalition found that most cities use their local return to operate small bus systems and repave streets, with little left over for active transportation. Increased eligibility for uses like stormwater capture and transit-oriented communities are good policy innovations, but create further demands on what is already a limited funding source. Without adequate policy guidance and reporting requirements from Metro, cities may not invest their local return in ways that advance regional goals around traffic safety and mode shift. Stronger guidance around complete streets implementation and clear reporting of expenditures to Metro will ensure that local return funds are spent efficiently and effectively to advance regional goals, while maintaining local control.

### *Changes to Expenditure Plan in Response to Future Needs*

Specificity is important to win the trust and support of voters, but it is also impossible to project transportation needs 40 and 50 years into the future with any degree of certainty. In 1976, transportation priorities were very different than they are today, and we are only now starting to fix the mistakes of last century's paradigm. We must approach this measure with the humility to recognize that we may not know whether our current priorities will stand the test of time. It would be prudent and practical to create a clear and transparent process to amend the project list and timeline in response to future needs. Like in Measure R, a provision to allow the Metro Board to change funding allocations — with a two-thirds vote — is needed to allow future elected officials to adapt the plan as circumstances and priorities change.

### *Expanding Public Participation*

This \$120 billion plan has been in development for several years, but only recently circulated for public review and comment. There have been nine public meetings over the course of four weeks, and an additional two weeks of telephone town halls. In stark contrast,

the County of Los Angeles has sought extensive input on its potential \$1 billion parks ballot measure by hosting over 200 public meetings in every community in the county. If a meeting had low turnout, they hosted another one in the same community and did more outreach. The County also partnered with local community-based organizations to spread the word about the measure and seek additional input. Given the scale of investment proposed, we believe Metro’s outreach should have been much more extensive, with a physical presence in more communities to hear about their mobility needs. This outreach should have begun *before* the draft plan was released so that community input could inform proposed investment priorities, instead of forcing community members to respond to a plan that is unlikely to change dramatically between now and its June adoption.

Moving forward, it is important that Metro proactively engage residents and community-based organizations to inform major planning and policy decisions. The community input that was collected over the past two months should be seriously considered and result in real changes to the plan to address the concerns raised. For example, in almost every public meeting in April, active transportation was voted as the first or second priority for community members. This includes the Gateway Cities subregion, where there is zero proposed funding for walking and biking, despite strong community support. This disconnect between community input and the draft plan would not have been a surprise if the community were more effectively engaged during the development of the plan, and if their participation had been respected. With so little time left in the process to put a measure on the ballot, it is imperative that Metro now respect that public input and make investments in community-identified priorities.

In conclusion, we believe this measure should focus on building stronger, more connected communities — and faster commutes — for all residents, particularly students, older adults, and residents of low-income communities and communities of color that have borne the greatest burdens of previous transportation decisions. The draft expenditure plan holds tremendous promise for our region and our communities, but additional — and more equitable — investments in active transportation, stronger commitments for bus riders, and greater use of pricing strategies to manage travel demand, would help this measure more effectively meet Los Angeles County’s mobility needs and make it worthy of support.

Thank you for your consideration of these comments. If you have any questions, please contact Jessica Meaney at [jessica@investinginplace.org](mailto:jessica@investinginplace.org) and Tamika Butler at [tamika@la-bike.org](mailto:tamika@la-bike.org).

Sincerely,

**Manal J. Aboelata**  
Managing Director  
Prevention Institute

**Eric Batch**  
Vice President, Government Relations  
American Heart Association

**Jenny Binstock**  
Community Member  
City of Los Angeles

**Ana Bonilla**  
Community Member  
City of Glendale



**Deborah Weinstein Bloome**

Senior Director of Policy  
TreePeople

**Eric Bruins**

Principal  
Bruins Policy Solutions

**Juana Rosa Cavero**

Community Member  
City of Los Angeles

**Scott Chan**

Program Director  
Asian and Pacific Islander  
Obesity Prevention Alliance

**Emilia Crotty**

Community Member  
City of Los Angeles

**Joe Donlin**

Associate Director  
Strategic Actions for a Just Economy

**Demi Espinoza**

Southern California Policy Manager  
Safe Routes to School National Partnership

**Chione Flegal**

Director  
PolicyLink

**Jennifer A. Gill**

Community Member  
City of Los Angeles

**Bill Greif**

Community Member  
City of Los Angeles

**Khalilha Haynes**

Community Member  
City of Los Angeles

**Alina Bokde**

Executive Director  
Los Angeles Neighborhood Land Trust

**Tamika L. Butler**

Executive Director  
Los Angeles County Bicycle Coalition

**Fernando Cazares**

Community Member  
City of Los Angeles

**Benjamin Creed**

Community Member  
City of Los Angeles

**Andrew Daly**

Community Member  
City of Los Angeles

**Rudy Espinoza**

Executive Director  
Leadership for Urban Renewal Network

**Laura Fisher**

Community Member and Artist  
City of Los Angeles

**Elizabeth D. Garcia**

Community Member  
City of Tarzana

**Vanessa Gray**

Executive Director  
CICLE

**John Guevarra**

Community Member  
City of Los Angeles

**Veronica Hernandez**

Community Member  
City of South Gate

**Caro Jauregui**  
Southern California Policy Manager  
California Walks

**Mike Kaiser & Kayla Kaiser**  
Co-Founders and Advocates  
Bikecar101

**Bryn Lindblad**  
Community Member  
City of Los Angeles

**Josue Martinez**  
Community Member  
City of Whittier

**Megan McClaire**  
Director of Health Equity  
Advancement Project California

**Ron Milam**  
Principal  
Ron Milam Consulting

**Nina Moskol**  
Chairperson  
Santa Clarita Valley Bicycling Coalition

**Deborah Murphy**  
Executive Director  
Los Angeles Walks

**Veronica Padilla-Campos**  
Executive Director  
Pacoima Beautiful

**Robert Peppey**  
Community Member  
City of Los Angeles

**Mikaela Randolph**  
Community Member  
City of Los Angeles

**Angie Jean-Marie**  
Community Member  
City of Los Angeles

**Alexis Lantz**  
Community Member  
City of Los Angeles

**Michael MacDonald**  
Steering Committee Member  
Bike the Vote Los Angeles

**David Matsu**  
Community Member and Business Owner  
City of Los Angeles

**Jessica Meaney**  
Managing Director  
Investing in Place

**Blair Miller**  
Co-Leader, Pasadena Complete Streets  
Coalition & Commissioner,  
Transportation and Design,  
City of Pasadena

**Laura Muraida**  
Research Director  
Strategic Concepts in Organizing &  
Policy Education

**Dominick Ortiz**  
Community Member  
City of Los Angeles

**Kristen Pawling**  
LA Urban Solutions Coordinator  
Natural Resources Defense Council

**Stephanie Ramirez**  
Community Member  
City of South Pasadena

**Alison Regan**  
Director  
Los Angeles Organization  
of Ultimate Teams

**Miranda Rodriguez**  
Community Member  
Highland Park, City of Los Angeles

**Cynthia Rose**  
Director  
Santa Monica Spoke

**Meghan Sahli-Wells**  
Councilmember  
Culver City

**Jess Sutich**  
Community Member  
City of West Hollywood

**Ryan Snyder**  
Community Member  
City of Los Angeles

**Jeremy Stutes**  
President  
railLA

**Mark Vallianatos**  
Community Member  
City of Los Angeles

**Jeanie Ward-Waller**  
Policy Director  
California Bicycle Coalition

**Ryan Wiggins**  
Community Member  
City of Long Beach

**Will Wright**  
Director, Government & Public Affairs  
American Institute of Architects LA

CC:

Mark Ridley-Thomas, Chair Los Angeles County Supervisor Second Supervisorial District  
John Fasana, First Vice Chair, Council Member, City of Duarte  
Eric Garcetti, Second Vice Chair, Mayor, City of Los Angeles  
Michael Antonovich, Los Angeles County Supervisor Fifth Supervisorial District  
Mike Bonin, Council Member, City of Los Angeles  
Diane DuBois, Council Member, City of Lakewood  
Jacquelyn Dupont-Walker, City of Los Angeles Appointee  
Don Knabe, Los Angeles County Supervisor Fourth Supervisorial District  
Paul Krekorian, Council Member, City of Los Angeles  
Sheila Kuehl, Los Angeles County Supervisor Third Supervisorial District  
Ara Najarian, Council Member, City of Glendale  
James Butts, Mayor, City of Inglewood  
Hilda L. Solis, Los Angeles County Supervisor First Supervisorial District

## **Appendix A: Investing in Place and Los Angeles County Bicycle Coalition Guiding Principles for LA County's Transportation Network**

**Connectivity:** A connected, multi-modal (walking, bicycling, driving, riding transit) transportation network is essential for Los Angeles County's continued growth and prosperity. A connected network is more than an array of major projects—it includes reliable and frequent bus service and a safe walking and bicycling environment so that people can access the core network. Relatively less expensive projects like bus rapid transit and first and last mile improvements are the glue that holds the rest of the system together.

**Integration:** It is no longer sufficient for transportation projects to have a singular focus on mobility. The public right-of-way is a significant asset that must be managed to achieve multiple objectives. *Complete streets* ensure that projects are safe and accessible for people of all ages and abilities, no matter how they travel. *Green streets* integrate stormwater and climate benefits to reduce water and air pollution, increase tree cover, and reduce environmental hazards from heat and flooding. *Great streets* provide economically and culturally vibrant places for people to enjoy and create a sense of place. An integrated transportation system aims to deliver these multiple benefits efficiently. At the same time that projects increasingly serve multiple purposes, expenditures need to be reported transparently so that the public can hold agencies accountable for making meaningful investments toward each objective.

**Safe, Healthy, and Equitable Communities:** Historically, transportation's benefits and burdens have not been equitably distributed in Los Angeles County. For example, the region's previous investment in freeways left many communities fragmented by race and income and, for many of these same communities, heavily burdened by pollution. Traffic collisions are a leading cause of death in low-income communities and communities of color where residents are most likely to walk, bike, ride the bus or train for transportation and, therefore, most vulnerable to unsafe streets, crosswalks, and sidewalks. Youth, older adults, and individuals with disabilities are at the greatest risk of getting killed in traffic, yet their travel patterns are not often factored into transportation decisions based solely on commute data. Lack of access to healthy food, health care services, schools, and safe opportunities for play are all correlated with poor health outcomes in low-income communities and communities of color—the same communities that have lower access to automobiles and are more likely to use transit. Unaffordable housing near regional job centers forces low-income workers to commute long distances. Given the lack of adequate housing policies in place to ensure development without displacement, there is little discussion or accountability concerning whether transportation infrastructure investments are serving those who have lived in impacted communities for years. Transportation investments have dramatically shifted the quality of life of residents—for better and for worse—which is why future transportation investments should address these historical inequities and mitigate any additional burdens.

**Quality Service for Transit Riders:** A well-run transportation system grows ridership by providing convenient, affordable, safe, and reliable transit service. The substantial majority of Metro's customers rely on the bus for most trips. Investing in frequent and reliable bus service will sustain and grow ridership. On high-demand corridors, smart investments in bus

rapid transit will provide faster, more reliable service at a lower operating cost per passenger. Sufficient operating support should be provided to keep fares affordable and avoid suppressing ridership, while investments in higher quality service can maximize the ridership benefit of limited operations resources. Sufficient investment in state of good repair is necessary for both rail and bus infrastructure to maintain system reliability.

***Sustainability:*** California has set ambitious statewide goals to reduce greenhouse gas and other emissions. The transportation system is the primary source of greenhouse gas emissions in California, which are closely correlated with vehicle miles traveled (VMT). The state policy framework created by AB 32 and SB 375, and implemented regionally by SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), mandates that the region reduce emissions by 13% by 2035. To achieve this emissions reduction, the RTP/SCS anticipates a VMT reduction of 10.2% by 2040. Future mandates from the state are expected to require further reductions to meet climate goals. Metro's expenditure plan will be the region's largest investment in sustainable transportation and should put Los Angeles County on track to meet SCAG's targets.