Policy Analysis: Measure M Guidelines

Executive Summary

Last month, Metro released draft guidelines for Measure M, the $120 billion transportation measure approved by Los Angeles County voters in November. These guidelines are the first opportunity to review Metro's approach to implementing the promises made to voters to invest in building a safe, sustainable, and reliable transportation system for the region. At 100 pages in length, the guidelines are a thoughtful and thorough first draft of the rules governing the administration of Measure M funding programs.

Investing in Place reviewed these draft guidelines with an eye toward integrating the policy best practices we care about--including data-driven decision-making, prioritizing the needs of vulnerable communities, and valuing public participation--into all Measure M projects and programs. In this report, we provide an overview of the guidelines and their role in implementation, highlight aspects that we are excited about, and recommend improvements to ensure Measure M stays true to the progressive ideals that led to its passage.

To make sure that Measure M lives up to its potential during implementation, Metro should:

- Ensure all projects and programs funded by Measure M comply with Metro's Complete Streets Policy;
- Prioritize traffic safety--particularly for people walking and biking--in all funding programs for streets and highways;
- Set clear objectives for each program in line with regional performance metrics;
- Require transparency and public participation in all project development and prioritization processes;
- Dedicate funding for countywide active transportation programs, including open streets, bike share operations, bike safety education, and safe routes to school non-infrastructure programs; and
- Support innovation in the Multiyear Subregional Programs by expanding eligibility for planning, data collection, project development, and transportation demand management (TDM) and building capacity at each council of governments (COG).

Metro is collecting public comment on the draft guidelines through May 26th. The Metro board is scheduled to adopt the guidelines in June so that they can take effect on July 1st.

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Introduction

In November 2016, Los Angeles County passed Measure M with an overwhelming majority of more than 71% of voters. Measure M is a permanent half-cent sales tax expected to generate over $800 million per year for new transit lines, bus operations, freeway projects, and complete streets. The Measure M *Ordinance*--the legal text that voters actually voted on--included the *Expenditure Plan*, which is the list of projects and programs that will receive funding from the measure. Now, Metro is working on the Measure M *Guidelines*, the 100-page document that will set the rules for how Measure M funds are administered. In other words, the *Ordinance* and *Expenditure Plan* determined **what** Measure M will fund while the *Guidelines* spell out **how** the measure will be implemented.

The Measure M Guidelines matter because implementation matters. These guidelines spell out the mechanisms for oversight and accountability, the ways in which Metro policies apply to various funding programs, and the criteria by which projects are selected and prioritized within each funding category. Relatively subtle policy language can determine whether communities will have a voice in project selection or whether all projects will need to consider the needs of people walking and biking. These guidelines also spell out objectives for each funding program and what consistency with regional performance metrics is required, if any.

These details were too specific for inclusion in the ordinance itself, but many Measure M supporters endorsed the measure based on assurances about how the funding would be spent. Writing provisions into the guidelines is how Metro can keep its promises to the diverse coalition that backed Measure M and generated the resources that will now make building a world-class transportation system possible. Fortunately, the next step for these draft guidelines is review by the newly formed Policy Advisory Council, which broadly reflects each of the constituencies that helped pass Measure M, including advocates for students, older adults, social and environmental justice, and active transportation, as well as the transit operators and local jurisdictions responsible for implementation of key parts of the Measure M program.

In addition to the Policy Advisory Council, other stakeholders including COGs, community organizations, and the public are invited to submit comments by the May 26th deadline for consideration by the Metro board in June. Comments can be submitted via the Measure M website at theplan.metro.net. By law, the guidelines must be adopted before the new sales tax goes into effect on July 1st.

Overview

The guidelines are an exhaustive list of all the rules and procedures that Measure M programs will follow. Some of these requirements apply to the entire Measure M program, while others are specific to each individual funding program. Many provisions, like the composition of the oversight committee, were directly transferred from the ordinance. Others, like the cost containment policy, are derived from current board-approved policies and practices. Yet others, like the local contribution to transit projects, contain substantial new policy definition. These guidelines will be a living document that can be amended over time as board policy changes and further clarification is needed, though any changes will require board approval.

Program-wide policies addressed in the guidelines include:

- Administration, oversight, and audits
- 5-year and 10-year program reviews and amendments
- Project acceleration, debt, cashflow management, and contingency funds
- 3% local contribution to major transit projects

The guidelines outline an overall approach to implementation focused on aggressive project delivery. They make project acceleration a key priority and identify opportunities to leverage funding from federal, state, and private sources. At the same time, the guidelines set procedures that minimize the risk that acceleration of projects in one part of the county might delay projects in other areas by carefully managing cashflow and cost containment and requiring a supermajority of the board for certain project approvals.

New to Measure M is a comprehensive program review every five years coordinated with the Short Range Transportation Plan (SRTP) and a ten-year assessment coordinated with the Long Range Transportation Plan (LRTP). While the five-year review is akin to a performance audit of Metro's delivery of Measure M projects and programs, the ten-year assessment is intended as an opportunity to review and consider revisions to the Measure M Expenditure Plan. By putting the SRTP and LRTP on regular cycles and mandating a periodic review of upcoming expenditures, Metro will now have a rigorous process for evaluating the effectiveness of its investments and whether funding priorities should change to respond to evolving mobility needs.

The guidelines also spell out a new Measure M policy that requires local jurisdictions to contribute three percent (3%) of the cost of major transit projects. This policy was included in the ordinance in general terms, but the guidelines elaborate on what counts as a contribution, including the eligibility of in-kind expenses, as well as which cities will be expected to pay based on station location. The guidelines also clarify the eligibility of first/last mile improvements toward the 3% contribution, based on board policy adopted last spring. Metro and the local jurisdiction will need to agree on a joint scope of work for these improvements, preventing cities from double-counting improvements in the station area they would have made anyway. The specific criteria for what first/last mile improvements will be included in a transit project scope remains to be determined.

The guidelines also set rules for individual funding programs, including:

- Highway and transit subregional programs
- Countywide funding programs
- Transit operations and state of good repair
- Paratransit and fare discounts for students and seniors
- Local Return

For each funding program, the guidelines detail key rules like eligibility and project selection criteria. The guidelines also determine who has decision-making and oversight roles for each funding program. Some programs are well-defined, while others defer key decisions until later. The Multiyear Subregional Programs are a new invention in Measure M--though not without precedent--so the guidelines spend a significant amount of attention on defining what they are and how they will be administered. Other programs like Local Return closely follow the rules already in place for Measure R with a few notable changes.

Analysis

Investing in Place seeks to integrate policy best practices throughout these guidelines that advance public health, environmental, and social equity outcomes to ensure that these policies are incorporated into all projects and programs funded by Measure M. Over the past several years, Metro has adopted forward-thinking policies on complete streets, first and last mile access to transit, urban greening, and other issues. These guidelines largely determine whether these policies will translate into real projects. Changes to the guidelines are needed to deliver on Measure M's promises. Below are some of the key issues and opportunities.

Project Readiness vs. Project Quality

A key challenge in translating new policies into on-the-ground improvements is the length of the project development process. The Measure M Expenditure Plan was developed in large part based on subregional Mobility Matrices, which list a grab bag of projects in each part of the county nominated by local jurisdictions. Some of these project ideas had been sitting around for decades while others were brand new. There was no screen on these projects for whether they are aligned with current regional goals or comply with current policies like complete streets. This poses a significant risk that Measure M could end up funding a number of stale projects that simply don't conform with the vision of a world-class transportation system sold to voters.

There was also no process to address needs that had not yet translated into a project. For example, cities without bike or pedestrian plans often didn't nominate projects into the Mobility Matrices. Many of the most critical transportation needs in our communities, like street safety improvements, are at square one in terms of project development. Using the Mobility Matrices as an eligibility screen creates an unnecessary hurdle that disproportionately affects more community-oriented projects, while the guidelines' emphasis on project readiness is a de facto prioritization of old-school projects over the types of projects that can have the most meaningful benefits for quality of life in our communities.

There is understandable pressure to break ground on as many Measure M projects as possible, and there are undoubtedly good projects that are ready to go to construction. But the focus on delivering projects can't come at the expense of quality control on whether those projects actually advance regional goals. Throughout, the guidelines lack an emphasis on planning and project development, which is how needs are identified, community input is gathered, and solutions are developed. Funding for study of a critical need or development of a strategic project may be a higher priority than funding implementation of a project that is ready for construction, but less strategic, and the guidelines should reflect this reality. A significant amount of support for Measure M was premised on its progressive vision for transportation in Los Angeles County, yet without a greater appreciation for planning and project development, and a check on projects currently in the pipeline, the guidelines risk entrenching the notion that innovative project delivery really just means business as usual, only faster.

Accountability and Effectiveness of Multiyear Subregional Programs

One of the key policy innovations in Measure M was the creation of subregional programs that fund smaller projects with tangible benefits for communities. These programs take many different shapes and can fund anything from greenways to street widenings depending on the priorities set by each subregion in the Expenditure Plan. This flexibility is a huge opportunity for innovation, but also a risk for accountability.

The intent behind these programs is to give each subregion a degree of autonomy to fund their priority projects and the guidelines reflect this intent with a relatively hands-off approach. However, this approach leaves a leadership void where local agencies are free to propose any eligible project on a first come, first served basis. Under the draft guidelines, there is no defined role for the COGs and Metro’s role is limited to screening for eligibility. No one is responsible for plan consistency, policy compliance, or prioritization of limited funds. Simply put, this is an unworkable way to administer a funding program.

Ideally, the Multiyear Subregional Programs would be collaboratively administered to achieve shared goals. Each subregional program should have clear performance objectives and identify projects that would meet those objectives rather than relying exclusively on project nominations by local jurisdictions. Project development and prioritization should be data-driven based on LRTP performance metrics, local metrics as applicable, and community input. The Multiyear Subregional Programs should build capacity at the COGs to conduct planning and project development to ensure that these programs fund the most strategic projects--regardless of the current state of project development. Each program should develop a pipeline of projects that is responsive to community-identified needs, endorsed by the applicable decision-makers in the subregion, and reviewed periodically for prioritization. Since Metro is ultimately accountable to taxpayers for the use of Measure M funding, Metro should have a strong oversight and policy compliance role (e.g. complete streets, urban greening, Title VI) in all subregional programs.

These subregional programs are new for Measure M, but they are not without precedent. The South Bay Measure R Highway Program offers one potential model for the Measure M Multiyear Subregional Programs. The South Bay Cities Council of Governments (SBCCOG) entered into a Memorandum of Understanding (MOU) with Metro to administer the program consistent with agreed-upon performance and project delivery objectives. The SBCCOG then submits a program of projects consistent with these objectives to the Metro board for annual approval.

This arrangement delegates some degree of autonomy to the subregion while maintaining a clear oversight and accountability role for Metro. Under this model, the Measure M Guidelines would set clear performance objectives for each subregional program and provide a process through which interested COGs could enter into an MOU to jointly administer the program. Any MOUs should outline clear expectations relating to performance measurement, project delivery, public participation, transparency, and periodic program review. Subregional programs for which the relevant COG does not enter into an MOU would default to Metro administration.

Limitation to Capital Projects Stifles Innovative Programs

The transportation sector is changing rapidly from a focus on infrastructure projects to providing mobility as a service. This paradigm shift is upending the traditional relationship between the public sector and the private sector. Some of the most promising innovations in transportation are programmatic, such as transportation demand management (TDM) programs that shape consumer behavior or the greater use of technology that utilizes infrastructure more efficiently. Yet, the draft guidelines restrict most funding programs to capital projects only, which will make it more difficult for the public sector to participate in innovative transportation solutions. Some subregional programs, like the South Bay's Transportation System and Mobility Improvements Program, that were intended to promote local innovation would be stymied by this arbitrary restriction.

Non-infrastructure solutions, including traditional TDM programs, education and encouragement, technology, and financial incentives, are generally more cost-effective than many capital projects. Other non-capital expenditures, like planning and data collection, are critical for understanding travel behavior and developing strategic, context-sensitive projects. While pre-construction activities, including preliminary engineering and environmental clearance, are eligible, these expenditures occur largely after a project is defined rather than in the formative stages of project development where innovation is more likely. Measure M is an opportunity to support this paradigm shift and maximize the public benefits of new creative approaches to transportation.

Outdated Objectives for Subregional Highway Programs

The subregional highway programs comprise a significant share of Measure M's total funding and provide resources for small and medium-sized projects on freeways and arterial streets throughout the county. While Measure R's highway programs were more narrowly focused on freeway widening and interchange improvements, Measure M takes a more comprehensive approach that includes many city streets and even bike paths. Thus, the name "highway program" is somewhat misleading when this category also includes broad eligibility for bike lanes, sidewalks, Great Streets, and other projects that one doesn't usually think of as highway projects.

Generally, the objectives across each category of highway program lack specificity and could just as easily promote old-school widening projects as more modern multimodal approaches. Objectives like "improve traffic flow" and "reduce…operational deficiencies" are veiled references to outdated Level of Service (LOS) metrics, while "trip reliability" is a more promising mode-neutral metric more in line with current best practices. These objectives should be better refined to ensure that highway programs support multimodal objectives and acknowledge well-documented issues like induced demand that plague traditional approaches to highway planning. Clearer objectives tied to performance measurement will enable the highway programs to demonstrate their effectiveness to taxpayers, which is all the more important when improvements are diffuse throughout a network.

Missing from the draft guidelines is a recognition that all arterials--and even some State Highways--are city streets that require context-sensitive solutions to accommodate all people and modes of transportation that use them. The objectives for the *Arterial Streets Improvements* category are taken verbatim from the *Highway Efficiency and Operational Improvements* and *Freeway Interchange Improvements* categories, despite vastly different contexts. While all highway program objectives should promote multimodal outcomes consistent with Metro's Complete Streets Policy, funding programs intended to improve city streets must do so with unambiguous objectives to meet the needs of people walking, biking, and taking transit as well as people driving. To be clear, "complete streets" is a policy that applies to all projects and all programs, not a project type separate and apart from the rest of the highway system.

More specifically, the highway program objectives lack a clear focus on safety, particularly for vulnerable road users. Vehicle crashes are the number one killer for children and youth in Los Angeles County, and among the leading causes of death for the everyone else. According to state records, crashes kill over 500 people annually in Los Angeles County--these are crashes on freeways, on major streets, and in neighborhoods. In addition to the catastrophic toll this traffic violence takes on our families and communities, collisions are a leading source of traffic delays that reduce the efficiency of our roads. Addressing chronic safety issues on our streets and highways will save lives and ease congestion, a clear win-win. With more jurisdictions, including the City and County of Los Angeles, adopting Vision Zero policies, Metro should support these efforts by making safety the first objective of all highway programs.

Finally, eligibility for highway program funds should be determined with a complete streets approach. The draft guidelines are quick to rule so-called beautification as an ineligible use of highway funds, without recognizing that streetscape elements like benches and trees that provide shade are functionally important infrastructure for people who are walking to the bus, to the store, or to school.

Funding for Countywide Active Transportation Programs

Measure M was the first of Metro's sales tax measures that sets aside funding for countywide active transportation programs, in addition to Local Return and the Multiyear Subregional Programs. This funding was intended to support implementation of Metro's initiatives like the Active Transportation Strategic Plan, in addition to major regional projects like completion of the LA River Bike Path. The guidelines rightly highlights synergies between this funding program and complementary initiatives like first/last mile, bike share, and Vision Zero.

While specific program guidelines will be developed within the next year, the draft guidelines imply that this funding will be competitively awarded to local projects. While it is important for some of this funding to support promising local projects and programs, Metro can and should first set aside funding for its on ongoing countywide program needs, including open streets, bike share operations, bike safety education, and safe routes to school non-infrastructure programs.

Next, Metro should target assistance to planning and project development in disadvantaged communities[1] to help level the playing field in terms of resources for active transportation as well as to increase the region's competitiveness for state and federal funding programs. Finally, Metro should focus its limited resources on supporting innovative pilot projects that can advance the state of the practice for active transportation projects and programs in Los Angeles County. While two percent of Measure M is significant in the context of Metro's historic underfunding of active transportation, it is a drop in the bucket compared to the overwhelming need, so Metro must use this limited available funding as strategically as possible.

Bus Rapid Transit Program Development

One of the most promising opportunities in Measure M for transit riders is the new Countywide Bus Rapid Transit (BRT) Expansion Program. Metro previously completed a BRT study in 2013, but that effort was limited to five corridors. With a new funding program included in Measure M, Metro's draft guidelines recognize that a more holistic approach to countywide BRT planning is needed. Within the next two years, Metro will revisit the 2013 study to evaluate additional corridors for potential BRT service, adopt a minimum definition to qualify as BRT, and establish procedures for prioritizing resources from the new Measure M program.

One limitation is that the draft guidelines just say the expanded study will include corridors identified in the Mobility Matrices. Left unsaid is whether or not this effort will consider high-ridership corridors not identified in a Mobility Matrix. As described previously, the Mobility Matrices process was not a rigorous needs assessment that overlooked some communities and project types based on participation and local planning capacity. As shown in Metro's most recent Quality of Life Report, there are many disadvantaged communities that lack access to high-quality bus service. In addition to corridors identified in the Mobility Matrices, Metro should assess opportunities for BRT to serve low-income communities and communities of color with gaps in current bus service.

[1] Investing in Places has proposed that Metro adopt a definition for "Equity Opportunity Zones" in the Long Range Transportation Plan to direct transportation resources to benefit communities with a history of disinvestment. For more information, see: http://bit.ly/TEOZpaper

Undefined Subregional Equity Programs

The final amendment to the Measure M Expenditure Plan in June created a *Subregional Equity Program* to offset the last-minute addition of a $180 million BRT project in the San Fernando Valley by providing an equivalent funding amount to all other subregions in the county. This Subregional Equity Program is equivalent to nearly $1.2 billion across eight subregions, yet the program has no objectives, no eligibility or selection criteria, and no timeline for implementation. While the draft guidelines say that additional evaluation criteria will be developed within a year, in the interim, projects will be funded on a first come, first served basis.

As previously described, first come, first served is not a strategic method for allocating transportation funding. Before any Subregional Equity Program funding is allocated, Metro should work with each subregion to identify which projects and programs are priorities for this funding. For example, the Gateway Cities left active transportation funding as "To Be Determined" in the Expenditure Plan. The $244 million in supplemental funding for the subregion would be a good source for meeting this otherwise unfunded commitment to active transportation. All subregions should conduct a transparent process for prioritizing this additional funding with robust public participation.

Potential Transit Service Expansion

Measure M dedicates 25 percent of revenue for transit service, including five percent for Metro Rail and 20 percent for Metro and municipal bus service. The guidelines articulate a clear purpose for these funds "to improve countywide transit service operations, maintenance, and expansion" with the goal of "making public transportation more convenient, affordable, and improve [sic] quality of life." As required by the ordinance, this funding will be distributed according to the pre-existing Formula Allocation Procedure that governs other bus operations funding.

Such a strong statement that this funding is intended to *increase* resources for transit operations and not supplant other funding, with the exception of during a funding shortfall, is a promising vision for transit riders. This funding makes possible critical investments in more frequent and reliable service along high-ridership bus lines, and other service enhancements that will attract bus riders back to the transit system. While the guidelines give significant discretion to municipal operators, Metro can lead the way by prioritizing its own new resources into frequent bus service and by collaborating with municipal operators to expand the frequent service network into their areas.

Paratransit and Student/Senior Discount Guidelines Developed Without Input

Measure M sets aside two percent to improve service for people with disabilities and provide fare discounts for students and older adults. The draft guidelines propose to allocate up to three-quarters of this funding for ADA paratransit service and the remaining funding to a revised fare discount program. (There is conflicting language in the draft guidelines whether the 25 percent for fare discounts is a minimum or a maximum.) The Metro board is scheduled to consider the revised fare discount program at its May 2017 meeting.

Metro's proposed approach to leverage additional resources from Measure M by reforming the existing underutilized fare subsidy program to serve more riders is strategic. One of the key complaints about the existing program is that it is poorly promoted and difficult to access. The revised program will take advantage of better TAP card integration to offer more flexible benefits and simplify the eligibility process.

While the proposal makes sense, the draft guidelines were not vetted with interested stakeholder groups that represent the affected communities. The Policy Advisory Council should discuss this proposal, including the proposed funding split between paratransit and fare discounts, to solicit input from experts representing people with disabilities, students, and older adults.

Local Return Expands Eligibility for Innovative Uses

The Measure M Ordinance included two provisions expanding the potential use of Local Return to include eligible stormwater projects (green streets) and infrastructure that supports Transit-Oriented Communities. The stormwater eligibility was included at the behest of many cities that need to identify new funding sources to meet new, stricter water quality requirements to prevent roadway pollutants from contaminating rivers and beaches. Leveraging green streets improvements as part of regular street rehabilitation projects is smart policy that is now easier under the draft guidelines.

The eligibility for Transit-Oriented Communities is less defined. The use of "Communities" rather than the more traditional term Transit-Oriented Development is a nod to the idea that transit-supportive land use is more about the built environment that makes up a whole neighborhood rather than any single development project. But what project elements are actually eligible for this funding remains unspecified in the draft guidelines.

Local Return is among the most flexible transportation revenue available to cities, which use it to operate local transit services, repair streets and sidewalks, install bike lanes, and leverage state and federal grants. With all these competing demands, it remains to be seen whether cities will choose to take advantage of this additional eligibility.

Local Return Floor Transfers Resources from Low-Income to High-Income Communities

Local Return is a critical funding source for many jurisdictions to provide for local transportation priorities. The Measure M Ordinance clearly stipulates that Local Return funding should be allocated according to population. In various discussions leading up to the Measure M Ordinance, alternative formulas were considered and dismissed as less equitable. For example, formulas based on road miles or land area would favor sprawling jurisdictions over those with more efficient land use and transportation patterns. Sales tax receipts-based or employment-based formulas would favor those jurisdictions that have overbuilt office and retail and underbuilt housing supply in the midst of a historic regional housing shortage.

Despite the consideration and rejection of alternative formulas, the Measure M Guidelines include a proposal for a minimum allocation of $100,000 per year to eight jurisdictions that would otherwise receive less funding from the per-capita formula. This extra funding would come from proportionally reducing allocations to all other 81 local jurisdictions.

Transferring resources from one location to another based on concerns for equity is not inherently bad policy. In fact, Investing in Place advocates for policies that direct resources to communities based on factors like race and income that are indicative of historical disinvestment. However, any such proposal must be cognizant of the complicated history of land use and transportation in Southern California.

This proposal fails that test. The eight jurisdictions that would benefit from the Local Return floor fall into two categories: they are either small, exclusive suburbs born out of a history of residential segregation or industrial tax havens that have intentionally excluded residents to avoid accountability for environmental justice impacts from heavy industry. In other words, there is no rational policy basis for transferring resources from the other 81 jurisdictions, including low-income communities like Bell and Cudahy, to the eight cities that would benefit from the transfer. Adjusting the Local Return floor higher or lower than $100,000 changes the list of which cities benefit and which ones are impacted, but it doesn't change the fundamental calculation that the cities that benefit the most from any Local Return floor are those with a history of exclusion and/or environmental injustice.

Recommendations

Investing in Place recognizes the extraordinary amount of work that went into creating the draft guidelines and appreciates the public review process that is now underway for improving them. Much of the preceding analysis focused on those relatively few parts of the guidelines that should be improved while glossing over the many more sections that lay a strong foundation for implementation of Measure M.

These guidelines hold significant promise for promoting innovative transportation solutions, supporting critical transportation needs like safe streets and sidewalks, and ensuring public participation in decision-making. The following summary of recommendations will advance these goals.

The final guidelines should:

- Clarify that Metro's Complete Streets Policy applies to all funding programs, including multiyear subregional programs, and define Metro's oversight role to ensure compliance.
- Ensure broad eligibility of programs that support behavior change (i.e. TDM), planning, project development, and data collection, not just capital projects.
- Set aside money within the Countywide Active Transportation Program (2%) for ongoing Metro program needs, including bike share operations, open streets programs, bicycle safety education, and safe routes to school non-infrastructure programs. This funding should also support planning and project development in disadvantaged communities and pilot projects that advance the state of the practice.
- Make safety the first objective for all highway programs--particularly for people walking and biking--and clarify objectives for congestion reduction to reflect current planning practice and regional performance metrics.
- Clarify eligibility of streetscape elements, such as pedestrian amenities and shade trees, that have functional purposes aside from beautification.
- Remove references to Mobility Matrices for determining eligibility or priority within funding programs, and instead have clear criteria for project selection consistent with current policies.
- Require each subregion to prioritize its subregional equity funds in a transparent process with public participation.
- Avoid distributing funding in any program on a "first come, first served" basis.

- Reconsider policy basis for potential local return "floor" that is actually a fund transfer from lower-income areas to wealthy suburbs and industrial tax havens. Clearly articulate definitions for any use of terms like "fair" or "equitable" that aren't actually based on advancing social equity, safety, or other policy objectives.