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Draft Connect SoCal Plan Comments
Attn: Connect SoCal Team
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700
Los Angeles, California 90017

The South Bay Cities Council of Governments (SBCCOG) appreciates the extensive work that went into producing the draft Connect SoCal Plan and technical papers. We were very happy to see SCAG's acknowledgement of the importance of neighborhood mobility areas and the positive role that neighborhood electric vehicles can make to address growth and sustainable mobility.

The SBCCOG has five primary comments:

1. The Plan refers to TNC fees in several locations. The SBCCOG strongly believes that TNC fees should be collected at the local level. They are analogous to taxi franchise fees which are collected locally and the burden identified on the infrastructure is primarily local. Regional entities should not be levying those fees and making it difficult for local governments to use this revenue source.
2. Shared use of sidewalks for bicyclists, scooters and pedestrians is discussed. The SBCCOG is concerned about the safety ramifications and municipal liability this strategy would engender.
3. Express Lane net tolls are to be used in the corridor from which they are collected by State Law.
4. Improvements on freeways including additions of Express Lanes should include corridor integration management with the arterials and local transit as referenced in the I-210 pilot.
5. TOD strategies are endorsed but there is no documentation as to how they are actually working to reduce VMT. Some research indicates that while residents of TOD buildings use transit, they do not reduce their driving. Net transit growth or single-occupant VMT reductions should be calculated for TOD strategies. In addition, growth in hot-spot congestion and air quality hot spot impacts should be calculated for TODs.

The SBCCOG Board also reviewed the following more specific comments and typo and timeline issues are as follows:

- Page 38 – Acknowledges that a growing number of adults are choosing to age in place and want to remain in their community. However, it also states that we need to plan for a walkable, compact environment to avoid unsustainable urban sprawl. While true, densifying the community is why we are seeing NIMBYs who prefer the community that they know without the traffic and parking impacts attendant to densification.

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

- Page 49 – Acknowledges promoting neighborhood electric vehicles and access to services through technology such as telework, telemedicine and other incentives to reduce single-occupant vehicle miles travelled.
- Page 51 – Transit Priority Areas (TPAs) are defined as intersections of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. While the Plan discusses safe and convenient transportation alternatives, it appears that TPAs are justified solely by the frequency of service without a priority placed on personal safety and security and other perceptions that are keeping people from riding transit. Also, the performance measures and results of the plan project that in 2045, the transit mode share will be 12.5% of work trips and 7.7% of all trips if we adopt the policies and programs in the plan. The table which shows the county breakdown is missing so it is not clear how much, if at all, TODs will contribute to congestion reduction.
- Page 51 – Neighborhood Mobility Areas (NMAs) encourage walkability, active transportation and short, shared vehicular trips. If someone is taking a short trip, why would they necessarily want to wait to share a ride?
- Page 52 – Acknowledges the South Bay Fiber Network project as a Promising Practice.
- Page 60 – Discusses the potential application of cordon/area pricing and says that the revenues would go directly toward transportation improvements, pedestrian amenities and economic development. Would those revenues stay in the area from which they are generated or be available throughout the whole county, SCAG region, or Air Quality Management District? Metro wants to dedicate its net revenues for transit improvements and SCAQMD wants to use revenues to solely to improve air quality. And, how would it be enforced since from our own experience, we know Metro is not using the net Express Lane revenues within the I-10 and I-110 corridors that we are entitled to under State law?
- Page 61 – Commends the I-210 Pilot which integrates management and operation of the freeway with nearby arterials and local transit. Shouldn't this be a strategy for other freeways? We know that parallel arterial improvements are not included in Express Lane projects that LA Metro is pursuing on the I-105 and I-405.
- Page 73 – Discusses analyzing shared use of sidewalks for bicyclists, scooters and pedestrians. Do we want to consider vehicles for the sidewalks considering the safety ramifications and municipal liability this strategy would engender?
- Page 74 – Regional Express Lane Network discussed building on the success of the I-10 and I-110 Express Lanes in Los Angeles County. How is “success” defined? What are the mobility and sustainability metrics?
- Page 77 – typos and timeline issues. 3rd one on the chart should be I-105 and we understand it to be LA County's first priority so why would it be completed in 2029? Has Metro changed the sequencing? Also, can the Sepulveda Corridor Express Lanes be completed by 2026?
- Page 96 – typos – the Figures are numbered differently in the text than they are on the charts and the numbers don't match the text on Figure 4.1
- Page 97 – states that it assumes mitigation measures such as the establishment of a mobility equity fund to provide resources that can increase access for environmental justice communities. Would this be county by county or regionwide? Additionally, “Environmental Justice Communities” need much more definition.
- How do these anticipated costs pencil out to create more funds and make the Plan achievable?
 - Page 96 – 22% new revenue needed to implement the programs and policies in the Plan

- Page 97 – Construction cost increases will be projected at a 4.5% annual inflation factor increase.
- Page 99 – Retail Sales tax growth is from 1.1% to 3.7% (Page 96 – core sources - 61% local)
- Page 100 – Transit O & M costs grew 5% with the regional average being 3.3%

In light of the foregoing stats, how does SCAG project a balanced budget or what are its prioritized strategies if additional revenue is not forthcoming?

- Page 101 – Reasonably available new revenues include a per-mile charge of ca. \$.05 (2019 dollars) for Transportation Network Companies (ex. Uber and Lyft). While cities are losing their franchise revenues from taxi companies, the region wants to take this funding source away from cities. We have objected to this at Metro and should comment here.
- Page 102 – colors on the chart are so similar it's impossible to understand.
- Page 106 – relies on Congress for significant amount of funds – almost \$50 billion over the period of the Plan – to 2045. Is this a realistic assumption based on historical investment trends?
- Page 108 – Relies on \$27.3 billion in farebox revenues – most from Metro and Metro is possibly considering free fares. Also, what level of transit service would \$23.7 billion in fare revenue support? Is there a target for how much the farebox should be providing in revenues for the service delivered?
- Page 108 – Highway Tolls are described as including revenues generated from I-10 and I-110 Express Lanes. It appears that the net proceeds are not expected to come back to the corridors which is a violation of current state law.
- Page 111 – Value Capture Strategies are defined as EIFDs and tax increment financing for transit supportive housing related infrastructure such as improved water and sewer infrastructure in Transit Priority Areas. How does this create transportation dollars?
- Page 122 – Performance Results of the Plan appear to be rather slight benefits for all of these funds expended – in Los Angeles County, less than 2 minutes per capita improvement in daily delay and 3 miles less in daily VMT per capita.
- Page 127 & 133 – missing information. The numbering of the tables goes from Table 1 to Table 5.7. Where are the missing tables – 5.2 through 5.6? The text states that Table 5.2 shows transit mode share by county which would be important to see.

Thank you for your consideration of our comments.

With gratitude,

Christian Horvath, SBCCOG Chair
Councilman, Redondo Beach