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Hasan Ikhata
Executive Director
Southern California Association of Governments
818 West 7th Street, 12th floor
Los Angeles, CA 90017

Re: Comments Going Forward – Preparing for the 2020 Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS)

Dear Mr. Ikhata,

Crafting a transportation investment plan that will interact with projected growth and land uses in order to help reduce vehicle miles traveled (VMT) to meet state targets is indeed a challenge. Congratulations to you and your entire organization!

As SCAG completes the second RTP under SB 375 and begins work on the third, the SBCCOG requests that SCAG expand upon several innovations included for the first time in the 2016 RTP, and work on their development beginning soon after the adoption of the 2016 RTP/SCS as well as the other issues presented below.

1. Expand and formalize the internal Innovation Technology Working Group

SCAG used an informal working group of staff members to tackle the problem of understanding how the continuing explosion of digital technologies can contribute to or detract from VMT reduction. The RTP's Mobility Innovations Appendix describes the process and expresses the findings. This is a very good start on what promises to be a key policy area for consideration in the 2020 and subsequent RTP/SCSs.

We request that SCAG convene a multi-jurisdictional Technology Working Group to expand the set of technologies considered and incorporate the latest research. The internal group should be expanded to include interested policy stakeholders such as the AQMD, Caltrans, CARB, CTCs, the sub-regional COGs and possibly other relevant organizations such as the Auto Club. The proposed Technology Working Group could be seen as comparable to the Public Health – Active Transportation Working Group. It could present its progress semi-annually to one of the Policy Committees.

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

2. Develop the concept of the Neighborhood Mobility Area (NMA) that was introduced in the 2016 RTP/SCS.

The NMA could be a very useful concept for transit-poor cities and sub-regions, places where HQTAs and TOD will have little impact and are not always politically feasible. The NMA today consists of a variety of state and local policies (such as complete streets) but the concept should evolve into a spatial framework for absorbing growth without adding private vehicles. This will require research and modeling (perhaps using the scenario planning model) in order to further define the concept to the point where carbon impacts can be calculated and implementation can be described. Progress could be reported to a Policy Committee at least semi-annually.

We request that SCAG further develop the NMA as an alternative to the HQTAs for incorporating growth – in time for the 2017 Cap and Trade funding cycle.

3. Develop a strategy to incorporate NMAs into the eligible uses of State funding programs such as Cap and Trade.

Complying with the RTP/SCS is a gateway to many State programs that fund sustainability projects, especially the Cap and Trade Program with its Greenhouse Gas Reduction Fund. The combination of the 2016 RTP/SCS with state funding guidelines provides incentives to South Bay cities to develop projects based on density and HQTAs that will not reduce GHG emissions in many cases and could increase congestion.

We ask SCAG to consider approaching the California Air Resources Board and the Strategic Growth Council about including the concept of Neighborhood Mobility Areas (NMAs) as an alternative to HQTAs in the various funding programs for sustainable communities. For the South Bay, NMAs can provide an implementable strategy that will reduce greenhouse gas emissions in our subregion. We would like to work in collaboration with SCAG to seek legislation and/or regulations that would reflect the concept of NMAs in state law and funding eligibility.

4. Develop a zero emission vehicle strategy equivalent to other strategies mentioned in the 2016 RTP/SCS, such as transit, passenger rail, highways and active transportation.

Reducing the total number of vehicles, the number of vehicles with tailpipes, and the number of miles driven on fossil fuels are the only means of improving air quality and reducing metric tons of carbon through transportation. Transit infrastructure and TODs are useful to the extent that they contribute to one or more of these carbon reduction means and, even then, the carbon impacts are not guaranteed, require a substantial public sector investment, and take a lengthy time period to be realized. Replacing a carbon mile with a zero emission mile pays direct and immediate benefits.

Soon after the adoption of the 2016 RTP, we request that SCAG design a process for developing a zero emission vehicle strategy that will produce a ZEV strategy for incorporation into the 2020 RTP/SCS.

5. Develop an alternative scenario for evaluation that incorporates the findings from the first 3 suggestions above.

Understanding the *use-case* for key technologies, developing the NMA, and planning in support of ZEVs should provide the basis for a scenario option that responds to the region's growth forecast but

does not involve increasing land use density to support more transit service, especially along HQTAs. Scenarios 3 and 4 in the 2016 RTP/SCS are simply more intense versions of the same strategy. We'd like the region to have a strategy option, not just intensity options and for the 2020 RTP/SCS to more formally incorporate a neighborhood oriented alternative to traditional smart growth.

We request that SCAG develop a different scenario option for the 2020 RTP/SCS.

6. Make built-out cities and sub-regions eligible for funding to assess their carrying capacity in the next Call for Projects.

The policy of increasing density in the built-out counties and preserving open space in the outer counties doesn't appear to consider the carrying capacity of the already built-out areas. The idea of preserving green fields as a strategy to avoid building costly infrastructure on the edge does not take into account the potential to exacerbate infrastructure issues in the core. For example, landfills, sewers and utility infrastructure in many built-out jurisdictions are overloaded and in need of repair; open space per capita has been declining, roads and sidewalks are in disrepair, and so forth.

We believe that such an analysis should be undertaken so that the true cost of the infill density, TOD and HQTA strategy is understood.

7. Expand the Regional Council's RTP/SCS final adoption process to include at least one meeting where the entire draft document can be discussed and amendments requested.

All committees didn't get to comment on all of the RTP in this cycle. Each Policy Committee focused on its specific subject matter and had little opportunity to influence the policies adopted by other committees. So when the Regional Council was asked to vote for the plan, there were some objections from policy committee members who didn't have a chance to discuss chapters outside of their subject areas.

We suggest that in 2020 RTP/SCS there should be an opportunity – one additional meeting – where all policy committee members can comment on all of the draft RTP chapters.

If you have any questions or want to discuss this further, please contact our Executive Director, Jacki Bacharach.

We hope that the ideas that we have expressed will be of interest to you and we look forward to your response.

Sincerely,

James Gazeley, Chair
Mayor, Lomita