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Re: Comments by the South Bay Cities Council of Governments (SBCCOG) on the Strategic Growth Council Affordable Housing and Sustainable Communities (AHSC) Draft Guidelines

The AHSC Draft Guidelines reflect a great deal of creative staff work. Thank you for the opportunity to comment.

The SBCCOG has a big picture concern. The draft program alternatives for achieving carbon reductions are narrowly confined to walking, cycling, and transit mobility options supported by increased residential density, especially through TOD. While these may be traditional elements that lead to carbon reduction, defining eligibility for grants only in those terms excludes more recent, innovative strategies that fit more of the varied contexts found throughout California.

The South Bay of Los Angeles County includes 15 incorporated cities plus parts of both the City and County of Los Angeles. The area is about the size of Portland with 1.5 times Portland's residential density and without a central city and the extensive public transit system. The Metro light rail system (Green Line) runs along the South Bay's northern border with only an insignificant extension planned through 2035. Bus service is relatively poor and as a result public transit has only a 2.8% mode share. Cycling mode share is around 0.8%. This despite relatively high residential densities organized in what are essentially horizontal mixed-use neighborhoods.

The result of the extensive mixed-use development pattern is that most trips are too far to walk and too short for transit. Adding density to an already dense sub-region will only generate more congestion since even 100% increases in transit use and biking would still leave private vehicles with over 90% mode share.

Recognizing that the goal of zero emission mobility would not be achieved by the density-transit strategy, the South Bay Cities Council of Governments began a research program in 2004 in order to find an alternative. The Sustainable South Bay Strategy (SSBS) was the result -- completed in 2009 and adopted by the SBCCOG Board in 2010.

LOCAL GOVERNMENTS IN ACTION

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Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

The land use component of the SSBS is known as Neighborhood Oriented Development (NOD) and it involves developing compact commercial centers within ½ mile of every home and gradually replacing existing strip commercial with residential at densities compatible with adjacent neighborhoods. This adds housing without increasing average residential density.

The mobility component of the SSBS involves introducing zero emission local use vehicles for those trips that are too long to walk and too short for transit. 80% of trips are less than 3 miles. A mobility services bundle (car sharing, ride sharing, van pools, bike sharing, and some form of public transit such as DASH or DART services) are expected to reduce the number of vehicles per household and substitute low carbon trips for high carbon trips.

Beyond the research that produced the SSBS, the SBCCOG has demonstrated the viability of the mobility and land use components in a series of demonstration projects. They include a neighborhood electric vehicle demonstration project (Local Use Vehicles: The Missing Mode in Sustainable Mobility), a battery electric vehicle demonstration project (Drive the Future) both funded by the SCAQMD; NOD proof of concept economic simulation funded by SCAG; and a PEV readiness plan funded by the CEC. In all, over \$2 million have been invested by SCAG, Metro, SCAQMD the CEC and the SBCCOG in developing and demonstrating in the South Bay an alternative strategy to density -transit. Most mature suburban sub-regions throughout California have development patterns and auto dependent mobility similar to the South Bay. Density-transit as the sole basis for funding excludes many sub-regions.

In general, the SBCCOG urges that the SGC expand the funding criteria to include more options beyond walking, cycling, transit and TOD, so long as the alternative strategy will lead to affordable housing and carbon reduction.

A core issue is the reliance on VMT reduction as the sole metric linked to GHG emissions reduction. From the South Bay perspective, total VMT is too coarse a metric. We break it down into tail pipe VMT, pedal VMT and electric VMT. We want to minimize tail pipe VMT and increase the other two.

Our position is also consistent with the fact that 100% of vehicles sold in Southern California by 2025 will need to be zero emission in order for the region to meet federal air quality standards. Using total VMT as the primary metric in the AHCS program fails to encourage progress toward the very real need to encourage ZEVs in as many applications as possible.

A few examples of specific language changes that would follow from our general comments should help illustrate the point:

A statement like “projects must demonstrate GHG reductions that focus on VMT reductions” should be replaced by “projects must demonstrate GHG reductions that focus on reducing tailpipe VMT.”

Lists of eligible modes should be expanded by including Zero Emission Vehicles of any type, especially those that are slow speed and short range.

Where investments in transportation & transit-related infrastructure are limited “to enhance: public

transit and pedestrian or bicycle access between transit station, housing and key destinations,” eligibility should be expanded to transportation infrastructure that “enhances public transit, pedestrian, bicycle or ZEV (including slow speed short range ZEVs) between all origins and destinations.”

References to TOD should be amended to also include neighborhood oriented development (NOD) or other development patterns that support walking, pedal technologies and ZEVs including slow speed, short range vehicles.

The definition of high quality transit corridors is too loose to offer guidance for affordable housing development. A corridor with a single bus line that meets the fifteen minute peak-headway standard does not justify building additional density. We have found that in most cases of HQTC in the South Bay, the off-peak service levels are very poor and in many cases there is no evening or weekend service whatsoever. Because of this permissive definition, about 70% of the major arterials in the South Bay currently qualify as high quality transit corridors yet there is very little of actual high quality transit. And mode share is stuck at 2.8% with little promise of improving. Additional density will reduce very little carbon but will surely increase congestion.

In conclusion, the Draft Guidelines fail to recognize innovative strategies developed in areas where transit does not now nor will in the future play a significant role providing mobility. Those areas deserve access to funding for affordable housing as long as some form of zero emission mobility can satisfy the travel demands created by the new housing development.

These few comments on the Draft Guidelines have been made from the perspective of the South Bay Cities Council of Governments and its Sustainable South Bay Strategy. The various research and demonstration reports upon which the SSBS is based are available at www.southbaycities.org. The SBCCOG will be happy to work with SGC staff in order to identify ways for incorporating the SSBS into the Guidelines.