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January 29, 2016

Draft 2016 RTP/SCS Comments
Attn: Courtney Aguirre
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Re: Comments on the 2016 Draft Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS)

Dear Ms. Aguirre,

Congratulations to you and SCAG staff on producing the 2016 Draft of the RTP/SCS. It is a comprehensive, complex document and provides a framework for discussing the future of the region.

The South Bay Cities Council of Governments (SBCCOG) Governing Board voted on January 28, 2016 to approve the following comments:

1. We appreciate that the 2016 RTP/SCS introduced the Neighborhood Mobility Area (NMA) concept. Like the land use component of the South Bay's Sustainable Strategy, NMA's have the potential to provide jurisdictions an opportunity to develop without reliance on high quality transit areas. (HQTA) We would like to see SCAG further develop the concept with criteria and implementation options.
2. Carrying Capacity: 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, Transit Oriented Development (TOD) and HQTA strategy is understood.
3. Vehicle Miles Traveled (VMT): Reducing VMT is the key metric of success in the draft 2016 RTP/SCS and may be consistent with state requirements; however, it is too coarse a measure to actually guide carbon reduction in the region. Going forward, SCAG should distinguish between electric VMT and carbon VMT. Focusing only on total VMT binds the plan to transit, cycling and walking which will have very minimal impacts on either total VMT or zero emission VMT.

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4. Alternate Vehicles: Page 7 of the RTP states that SCAG has focused on Plug-In Hybrid Electric Vehicles. With the market getting larger for PEVs with more range, this plan should not focus just on hybrids. This document should be a realistic vision of how the region can meet state goals as well as regional needs. Since it takes 15 to 25 years to turnover a fleet, it is vitally important to increase the number of all Plug-in Electric Vehicles on the road each year.
5. The SBCCOG is concerned that there are policies and strategies proposed in the Appendices that are not included in the main body of the RTP/SCS or are included in a general way. All of the recommendations for specific actions should be in the main document or in one place in an Action Document. It is possible that some of the strategies and policies have already been adopted by SCAG but the document doesn't say that is the case. If they have already been approved, that should be stated. If they have not, does voting for this plan constitute agreement with all of the recommendations going forward? Please see the following appendices:
 - Mobility Innovation – pages 2 - 5 of the Appendix include Policy Recommendations. Page 106 of the main document does state: “*These mobility innovations are discussed further in the Mobility Innovations Appendix*”. At a minimum, this sentence should be revised to state that the appendix contains policy recommendations.
 - Natural and Farm Lands – pages 6 and 7 of the Appendix have Strategies and Next Step Recommendations. Page 111 of the main document states: “*Please see the Natural and Farm Lands Appendix for additional detail*”. At a minimum, this sentence should be revised to state that the appendix contains policy recommendations.
 - Public Health - Page 19 of the Appendix contains the Public Health Work Program. It is not clear from the text whether the SCAG Board has adopted this work program already or whether it is being adopted with the passage of the RTP/SCS.
 - Transportation Safety and Security – Page 33 of the Appendix has Policies and Recommendations which are more detailed than the main document. At a minimum, the main document should include a sentence which states that there are more specific recommendations in the Appendix.

The SBCCOG is also submitting recommendations for the 2020 RTP/SCS in a separate letter to Hasan Ikrata.

Thank you for the opportunity to participate in this process.

Sincerely,

James Gazeley, Chair
Mayor, Lomita

cc: Hasan Ikhata, Executive Director

