

South Bay Cities Council of Governments

January 11, 2016

TO: Steering Committee

FROM: Jacki Bacharach, SBCCOG Executive Director

RE: SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy
Suggested Comments

Adherence to Strategic Plan

Goal B: Regional Advocacy. Advocate for the interests of the South Bay.

Background

The 2016 SCAG Regional Transportation Plan/Sustainable Communities Strategy was released for public review and comment in December. The comment period closes on February 1.

The RTP is enormously complex – well over 1000 pages. SBCCOG staff – primarily Jacki Bacharach and Wally Siembab - are still reviewing it and speaking with colleagues in other subregions as well as with SCAG staff at a technical meeting on January 21.

The following draft comments are provided for inclusion in the SBCCOG's official comment letter which is being developed:

1. Complex and comprehensive document – congratulations on getting it prepared!
2. NMAs: The concept of the Neighborhood Mobility Area, introduced in the 2016 RTP/SCS, is very close to the land use component of the SSBS. We think that it needs better definition. We would like to see SCAG further develop the concept with criteria and implementation options.
3. Funding: Complying with the RTP/SCS is a gateway to many State programs that fund projects that contribute to sustainability especially cap and trade funds. Having that gateway (HQTAs – see Map in Transit Appendix) defined by a strategy that cannot be implemented in the South Bay, excludes our cities from acquiring those funds. How can we address this today to help us qualify? How can SCAG help us in this plan with implementable strategies that reduce carbon in our subregion? We would ask SCAG to consider approaching CARB and the SGC about including NMAs as an alternative to HQTAs in the various funding programs for sustainable communities.
4. 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 those already built-out areas. The idea of preserving green fields as a strategy to avoid building costly infrastructure on the edge fails to account for the potential to exacerbate infrastructure issues in the core. For example, more and more frequently

sewer capacity and utility infrastructure problems in the built-out areas are overloaded and in need of repair.

5. 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 electric-VMT.
6. Alternate Vehicles: Page 7 of the RTP states that SCAG has focused on Plug-In Hybrid Electric Vehicles. Why? With the market getting larger for PEVs with more range, this plan should not focus just on hybrids. It takes 15 to 25 years to turnover a fleet so it is vitally important to increase the proportion of PEVs of all vehicles sold per year.
7. Specific Policy Recommendations in Appendix:
 - Goods Movement – Goods Movement Environmental Strategy and Action Plan
 - Mobility Innovation – Policy Recommendation
 - Natural and Farm Lands – Recommended Policies
 - Public Health - Work Program
 - Passenger Rail - Regional Passenger Rail Recommendations and Strategies
 - Transit - Recommended Accessibility Strategies & Recommended Operational Strategies
 - Transportation Safety and Security - SCAG Strategies & Policies & Recommendations

All of the appendices noted above have policy recommendations that are not included in the main body of the RTP. All of the policy recommendations should be in one document so that when the RTP is voted on, it is clear that those policies are part of the approval. If these recommendations have previously been approved by SCAG, the document should say so. If they are not part of the approval, then who are they directed to?

8. Process: All committees didn't get to comment on all of the RTP. Each committee was just given a chance to comment on the chapter in their subject area. So when the RC 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 would 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.
9. The COG would like the 2020 RTP/SCS to more formally incorporate our alternative to traditional smart growth.

RECOMMENDATION

SBCCOG staff recommends that the Steering Committee provisionally approve these draft issues for inclusion in an official comment letter to SCAG which is currently under development to be presented for final approval to the Board of Directors on January 28.