



**San Bernardino Associated Governments**

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Web: www.sanbag.ca.gov



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- San Bernardino County Transportation Commission •San Bernardino County Transportation Authority
  - San Bernardino County Congestion Management Agency •Service Authority for Freeway Emergencies
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**Support Material Agenda Item No. 10**

**General Policy Committee Meeting**

**May 11, 2016**

**9:00 a.m.**

Location:

**SANBAG**

First Floor Lobby

1170 W. 3<sup>rd</sup> Street, San Bernardino, California 92410

**Discussion**

**Regional/Subregional Planning**

**10. SANBAG Comments and Input on Statewide and Regional Plans in 2015 and 2016**

That the General Policy Committee recommend the Board receive an update on statewide and regional plans and programs developed in 2015 and 2016 related to transportation and the environment, and how SANBAG has provided input to those plans and programs.

*The Comment Letters referenced in the agenda item are attached.*

## Attachment

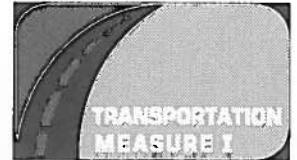
### Comment Letters from SANBAG and Joint Letters on which SANBAG was a Signatory

- Letter from SANBAG to Gabriel Corley, Caltrans RE: SANBAG Comments on the Final Review Draft of the California Transportation Plan 2040
- Letter from SANBAG to Malcolm Dougherty, Caltrans RE: Comments on the Draft 2015 Interregional Transportation Strategic Plan
- Joint Letter to Clerk of the Board of the California Air Resources Board RE: Comments on CARB's Sustainable Freight – Pathways to Zero and Near Zero Emissions – Discussion Draft and the Draft Heavy Duty Technology Fuel Assessment Overview
- Letter from SANBAG to Hasan Ikhrata, SCAG RE: Comments by San Bernardino Associated Governments on the Draft 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and Draft Program Environmental Impact Report
- Letter from SANBAG to Barry Wallerstein, South Coast Air Quality Management District RE: San Bernardino Associated Governments (SANBAG's) comments on the draft white papers for the 2016 Air Quality Management Plan (AQMP)
- Letter from SANBAG to Christopher Calfee, Governor's Office of Planning and Research RE: SANBAG Letter on SB 743 CEQA Guidelines and Technical Advisory
- Joint Letter to Christopher Calfee, Governor's Office of Planning and Research RE: Comments on the "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA" to Implement SB 743
- Letter from SANBAG to Jim Madaffer, California Road Charge Technical Advisory Committee RE: SANBAG Comments on the California Road Charge Pilot Program
- Joint Letter from SANBAG and County of San Bernardino to Ken Alex, California Strategic Growth Council RE: Draft Affordable Housing and Sustainable Communities (AHSC) Guidelines: TOD, Residential Densities, and Transit Headways in San Bernardino County



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March 29, 2016

Gabriel Corley  
CTP Project Manager  
Division of Planning, MS-32  
California Department of Transportation P.O. Box 942874  
Sacramento, CA 94274-0001

### **Re: SANBAG Comments on the Final Review Draft of the California Transportation Plan 2040**

San Bernardino Associated Governments (SANBAG) appreciates this opportunity to offer comments on the final review draft of the California Transportation Plan (CTP) 2040. SANBAG is the Council of Governments and County Transportation Commission for the County of San Bernardino, the largest county geographically in the continental United States (over 20,000 square miles) and home to 2.1 million residents.

We recognize that Caltrans has worked long and hard on a substantial redraft of the CTP. We believe this is a significant improvement and that the document itself is well structured and well written. We especially appreciate the effort that went into analyzing strategies for reduction in vehicle miles of travel (VMT) and greenhouse gases (GHGs). Analyzing the impacts of transportation strategies at a statewide level is extremely challenging, and Caltrans, together with the California Air Resources Board (CARB) were able to bring together the analytical tools for conducting this statewide analysis.

In explaining the purpose of the CTP, the Preface states that *“Regions have adopted growth plans, and will soon begin revising them, to deliver the more sustainable transportation system now required by California law. How does the state help achieve the same objective? That question is what this plan attempts to answer.”* The Preface goes on to describe the particular focus on sustainability, reduction of GHG emissions, reduction of VMT, and integration with other statewide and regional plans.

SANBAG’s concern, however, is that achieving some of the objectives, particularly the VMT reduction objective, is not as easy as the analysis in the CTP 2040 makes it sound. As an agency that focuses on funding and implementing multi-modal transportation improvements, we believe it is important for SANBAG to bring this additional perspective to Caltrans’ attention. This is particularly important since Caltrans indicates that *“the resulting CTP will serve as a guiding document of information for the development of future modal plans, programs, and major investment decisions on the transportation system.”* The CTP will have substantial influence on state policy.

As explained in our April 17, 2015 comment letter on the first draft of the CTP 2040, SANBAG has been actively engaged in charting a path toward a more sustainable future, as identified in our own Countywide Transportation Plan and our sustainability Memorandum of Understanding (MOU) with the Southern California Association of Governments (SCAG). Our countywide plan and the MOU describing some of our sustainability initiatives may both be accessed at the following SANBAG web page: [http://www.sanbag.ca.gov/planning2/plan\\_county-wide-transit.html](http://www.sanbag.ca.gov/planning2/plan_county-wide-transit.html). We continue to be very active in a wide range of sustainability initiatives including energy efficiency, GHG reduction, habitat conservation, demand management, active transportation, and integrated transit/land use planning. We understand the direction the state is going with the CTP, but believe it is important to comment on some of the VMT-based assumptions and analysis.

### **Analysis of VMT Reduction in the CTP 2040**

Caltrans has highlighted the fact that the analysis in the CTP represents a series of sensitivity tests on a set of transportation strategies that *“were created for the purposes of the modeling exercise and do not represent specific policy recommendations.”* We understand and appreciate that point. Nevertheless, some of the assumptions used for several of the strategies (most notably the pricing and transit strategies) are so extreme, that they are likely to be misleading if and when relied upon for “future modal plans, programs, and major investment decisions.”

We expressed this same concern in our comments on the first draft of the 2040 CTP. For example, we commented that the “doubling of transit service, doubling of transit speeds, free transfers, and reduced wait times is also a highly unrealistic scenario.” The final review draft CTP cut back on the transit speed assumption (now 50% higher than existing, not 100% higher), but kept the other assumptions intact. We strongly question whether achieving these levels of transit service is realistic, even if the necessary levels of funding, which would be unprecedented in scope, were to be provided.

We are assuming that Caltrans would envision that some or all of the funding for this dramatically increased level of transit service would come from the funds flowing from the pricing strategy explained on pages 11 and 12 of Appendix 7. As stated,

*“The ‘Implement Expanded Pricing Policies’ strategy increased, in the model, 2040 statewide auto operating costs by 16 cents per mile. The urban congestion charge also increased auto operating costs by an additional 16 cents per mile. This totals the urban county increase in auto operating costs by 32 cents per mile.”*

In our comment letter on the first draft, we had suggested that 16 cents per mile “is an extraordinarily high cost assumption, and would be equivalent to an extra \$4.00 in the cost per gallon of gasoline, assuming an average fuel economy of 25 miles per gallon for the auto fleet.” We suggested that Caltrans use a lower cost assumption, such as 2 cents per mile, which “would be equivalent to a still very aggressive 50 cent charge per gallon of gasoline, yielding a 2.8% reduction in VMT.”

Instead, the final draft of the 2040 CTP doubles down on the 16 cents per mile assumption, adding another 16 cents per mile congestion charge in urban counties. This is an extraordinary assumption. The 32 cents per mile is equivalent to an \$8.00 per gallon surcharge (in 2010 dollars) assuming an average fuel economy of 25 miles per gallon. Given that the CTP predicts that fuel economy will increase to 36 miles per gallon by 2040, this would be equivalent to a fuel surcharge of almost \$12 per gallon for urban drivers.

In addition, it is unclear why the level of VMT reduction from pricing in the draft final CTP is essentially the same (17%) as the reduction in the first draft, while the per-mile surcharge has virtually doubled. Without additional information, we can only assume that Caltrans concluded that the relationships between cost and travel used in the first draft were incorrect. In any event, we appreciate the re-analysis but are now even more concerned with the pricing assumption itself.

It should also be noted that these pricing charges represent an extraordinary amount of revenue. Just using conservative assumptions, and based on VMT estimates in the draft final CTP, the annual revenue from the pricing surcharge alone (not counting baseline revenue) would be approximately \$50 billion in 2010 dollars. Even though, as Caltrans indicates, these scenarios are for analytical purposes only and are not directly tied to the recommendations, we are concerned that readers will get the impression that the level of VMT reduction forecast in the CTP analysis is actually achievable. It would be wonderful if VMT reductions were as simple as the CTP makes them sound, but they are not.

It is important to have confidence in the CTP going forward, and as currently stated, the CTP wildly overstates the potential for VMT reduction compared to the reductions that would be analyzed with assumptions that most transportation analysts and policy makers would consider reasonable. It also dramatically overstates revenue potential. Even though the transportation revenue needs are large, even just to maintain our existing system, the levels implied by the analysis in the CTP are not realistic.

It is important to remember that a clearly stated principle of AB 32 (the Global Warming Solutions Act) is to “*achieve the maximum technologically feasible and cost-effective greenhouse gas emission reductions...*” (Part 4, Section 38560). Accordingly, the state’s expectations for VMT reduction need to be calibrated to what is feasible and cost-effective, especially in a document that will be as influential as the CTP 2040 is likely to be.

### **Why Be Concerned with the VMT Analysis?**

Why have we gone to this level of detail in focusing on the VMT analysis? First, the Preface of the CTP states that “*climate change is a key issue for California and the CTP 2040 is a benchmark document to address this challenge.*” VMT reduction is postulated as a critical element of the state’s efforts to reduce GHGs. Our contention is that the CTP substantially overstates the likely contribution of VMT reduction toward achieving the GHG reduction goal. This has implications for future investment and for emphasis in

state programs. We are concerned that unrealistic expectations of what can be achieved through VMT reduction will unnecessarily divert the state from making important investments in highway infrastructure, including projects in the SCAG RTP/SCS. The RTP/SCS is truly multi-modal, but it also notes that continued investment in the widening of highways is key to maintaining mobility at a level that will allow our economy to thrive.

SANBAG is supportive of all the core goals included in Chapter 4 of the CTP:

1. *Improve multimodal mobility and accessibility for all people*
2. *Preserve the multimodal transportation system*
3. *Support a vibrant economy*
4. *Improve public safety and security*
5. *Foster livable and healthy communities and promote social equity*
6. *Practice environmental stewardship*

Although the subsequent recommendations that support the goals are mostly process-oriented and somewhat generalized, we noted that one of the recommendations (on page 113) was to “*Implement SB 743 requirements in project development and project reviews across the transportation system.*” We have noted in our comments to the Governor’s Office of Planning and Research (OPR) that implementing VMT-related thresholds for highway projects through the California Environmental Quality Act (CEQA) process, based on the current OPR draft SB 743 guidelines, is likely to delay or otherwise set back the delivery of important highway improvement projects.

Highway mobility is still important, especially for our logistics-focused economy in San Bernardino County. Although we are highly supportive of the original intent of SB 743 in Transit Priority Areas (TPAs), we see that the application of proposed VMT-based thresholds for all highway projects as counter-productive and will have an adverse effect on the achievement of the CTP goals 1 and 3. The implication of the current OPR guidelines is that many more of our county’s highway projects (both state and local roadways) will require CEQA Environmental Impact Reports (EIRs), with statements of overriding considerations required for CEQA clearance. This does not seem to bother OPR, but it is a potentially serious barrier to the timely delivery of highway improvements by those agencies, like SANBAG, engaged in project delivery on a daily basis. Caltrans should be concerned. This recommendation should be eliminated or re-focused to apply to TPAs only. The direction of the OPR guidelines on SB 743 is an example of how unrealistic expectations on VMT reduction potential can percolate through to other transportation policies and have unintended adverse impacts on the state’s mobility and economic competitiveness goals.

#### **Connection of this Issue to the Economy**

We agree with the statement at the bottom of page 24 of the CTP under the “Prosperity” section that:

*“California’s positive economic outlook is sustained by creating an attractive business climate, continuing to build confidence in the economy, and investment*

*in a clean energy and transportation system. Transportation helps stimulate the economy by providing Californians with access to jobs, education, health care, goods and services, and social experiences and recreational activities.”*

To take that a step further, California needs a strong economy to be able to afford the technological advancements and fleet turnover rates that will enable the state to achieve its GHG reduction goals. The problem is that substantially increasing transportation costs will further set back our business climate, not advance it. Good transportation policy is a delicate balancing act – keeping on the leading edge of clean transportation, while not disadvantaging California and our businesses to the point where the exodus or downsizing of businesses is perpetuated or accelerates. This will set back California on multiple financial fronts, not just employment. Governor Brown’s Executive Order B-32-15 on sustainable freight, highlights the importance maintaining our state’s competitiveness while we also address GHGs, so we need to keep this balancing act in mind in specific policy initiatives, such as how SB 743 is implemented.

The state must remember that our long term success in promoting clean transportation will depend on the choices of individuals, particularly in their buying more fuel efficient and alternative fuel vehicles on a large scale. The RTP/SCS in the SCAG region shows that the vast majority of future travel in the region will still be by personal vehicle, even with all the major investments being made in transit, first mile/last mile strategies, active transportation, and other alternative modes. We need to make these choices attractive and economically feasible for Californians if we are to reach our GHG reduction target. SANBAG is concerned that an over-reach on VMT-reduction strategies will divert us from success, not lead us on a path to achieve it.

A surcharge at the level assumed in the CTP would have very substantial economic consequences to California, diminishing our economic competitiveness even more than it already is. Although it is recognized that pricing and transit strategies that are more realistic than those analyzed in the CTP will have a more limited impact on GHG reduction, this is the reality that we must deal with. Unrealistic assumptions will only cloud our path forward.

#### **Focus Primarily on Vehicle and Fuels Technology for GHG Reduction from Mobile Sources**

The CARB analysis of GHG strategies provided toward the end of CTP Appendix 7 clearly shows that technology-based initiatives will be where most of the GHG reduction must occur. Table 3 in the CARB memo on page 23 of Appendix 7 shows that the VMT-based strategies in the Alternative 2 scenario represent only 15% of the total 80% GHG reduction target by 2050. Given that the CTP’s pricing and transit strategy assumptions (both unrealistic in our view) represent over 2/3 of the source of per-capita VMT reduction, a realistic share of GHG reduction attributable to VMT reduction should be more in the range of 5 percent.

SANBAG suggests that the state maintain its emphasis on vehicle and fuels technology and acceleration of vehicle turnover rates as the primary strategy for GHG reduction for

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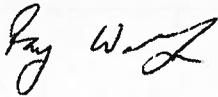
mobile sources. While we should certainly continue implementing transportation demand management (TDM) and transportation system management (TSM) strategies, we must have realistic expectations on the level of GHG reduction that can be achieved through these VMT-related and operational strategies.

SANBAG is concerned that too much emphasis on or expectation of VMT reduction will divert Caltrans and other state agencies from where the emphasis on mobile source GHG reduction needs to be, i.e. on vehicle and fuels technology. While the CTP does not include specific recommendations on pricing strategies, the analysis of VMT reduction will give citizens and policy makers the false impression that VMT can be reduced by a much greater amount than is realistic. In addition, a pricing strategy at this scale would impose the most severe impacts on disadvantaged communities, such as those we have in San Bernardino County.

At a minimum, a stronger disclaimer should be included in the CTP that highlights the magnitude of the assumptions that are driving the majority of the VMT reduction. Ideally, the analysis in the CTP should be revised to show a level of VMT reduction that is more realistically achievable.

Again, we appreciate the opportunity to comment on this important document. We look forward to continued collaboration with Caltrans and other state and regional agencies to achieve the goals set out in the CTP. We have attached a copy of our comment letter on the first draft of the 2040 CTP as background reference material. Should you have any questions, please contact Steve Smith, Director of Planning, at [ssmith@sanbag.ca.gov](mailto:ssmith@sanbag.ca.gov).

Sincerely,



Ray W. Wolfe  
Executive Director

ATTACHMENT



**San Bernardino Associated Governments**

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April 17, 2015

Mr. Gabriel Corley  
CTP Project Manager  
Division of Planning, MS-32  
California Department of Transportation  
P.O. Box 942874  
Sacramento, CA 94274-0001

Subject: Draft California Transportation Plan 2040

Dear Mr. Corley:

San Bernardino Associated Governments (SANBAG) appreciates this opportunity to offer comments on the draft California Transportation Plan (CTP) 2040. SANBAG is the Council of Governments and County Transportation Commission for the County of San Bernardino, the largest county geographically in the continental United States (over 20,000 square miles) and home to 2.1 million residents.

SANBAG actively collaborates with the Southern California Association of Governments (SCAG) and the other counties in the SCAG region on planning activities of regional significance, including development of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We are keenly interested in the CTP 2040, given its aim *“to help ensure that policy decisions and investments made at all levels of government and within the private sector will work congruently to enhance the State’s economy, improve social equity, support local communities, and protect the environment”* (CTP 2040, page 2). SANBAG has similar goals at the county level. Before presenting our comments, we thought it would be helpful to provide an overview of some of SANBAG’s initiatives and perspectives so that you have a better context for our comments.

**SANBAG Initiatives in Mobility and Sustainability**

SANBAG is actively engaged in the planning, funding, and implementation of multi-modal transportation improvements as well as sustainability initiatives across San Bernardino County. We signed a Sustainability Memorandum of Understanding (MOU) with SCAG in early 2013, delineating 16 sustainability initiatives to which our agency is committed. In addition, we are:

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- Part of the joint powers authority that constructed and now operates the Southern California Metrolink system.
- Currently building an extension of Metrolink to downtown San Bernardino and will be starting construction on a new passenger rail line from San Bernardino to Redlands in 2017.
- Collaborating with cities in the Metrolink and Redlands Rail corridors on Transit Oriented Development (TOD) initiatives.
- Collaborating with all our local jurisdictions on ridesharing, vanpooling, and active transportation projects, including the State's Active Transportation Program (ATP).
- Funding improvements to and operation of bus transit systems throughout the county of San Bernardino.
- Implementing, with the County of San Bernardino, the Countywide Vision adopted in 2011, in support of the national and statewide emphasis on sustainability. The Vision is a proactive approach to achieving sustainability goals and includes a health and wellness component and an environmental component as two of ten Vision initiatives. See <http://cms.sbcounty.gov/cao-vision/Home.aspx>.
- Partnering with local jurisdictions, the private sector, the health community, and health advocates on an aggressive program to improve all dimensions of public health in San Bernardino County.
- Working with 21 local jurisdictions to implement the Greenhouse Gas Reduction Plan adopted by SANBAG in early 2014.

We point to these and other activities to show that we understand and support the State's direction to have a balanced, multi-modal transportation system, healthy economy, and a sustainable future, including significant GHG reduction. It is noteworthy that southwestern San Bernardino County has some of the worst air quality in the U.S. Like other counties in the SCAG region, we are very concerned about air quality and are a regional partner committed to facilitating further improvements.

At the same time, over 20 percent of our labor force derives its living from the logistics sector, which is often cited as a primary source of air pollutants and greenhouse gas emissions. As we move forward with sustainability initiatives, we must pay attention to the dual objectives of GHG reduction while also promoting a vibrant economy. A vibrant economy is needed to support the technology advancements and adoption into the marketplace in a way that will make the GHG reductions possible. San Bernardino County has been slow to emerge from the Great Recession, and our citizens, many of whom are dependent on logistics for employment, cannot afford to be set back further.

### Specific Comments

1. SANBAG appreciates the effort, thought, and analysis that have gone into the preparation of the draft California Transportation Plan 2040. In particular, *Chapter 7: Analysis and Outcomes* is very illuminating as to where local, regional, and state, agencies will need to

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focus in an effort to reach the greenhouse gas reduction goals established in AB 32, SB 375, and the Executive Orders on GHG reduction. We recognize that analysis at a statewide level will necessarily be more generalized and cannot be applied directly to individual regions; nevertheless, the results are extremely useful for strategic planning purposes. It is a good way to begin gauging the feasibility and effectiveness of various GHG reduction strategies.

2. A clearly stated principle of AB 32 is to *“achieve the maximum technologically feasible and cost-effective greenhouse gas emission reductions...”* (Part 4, Section 38560). Until this analysis in the draft CTP 2040, it has been difficult to gauge technological feasibility and cost-effectiveness. Table 17 on page 91 of the CTP provides some critical pieces of information to help guide agencies in balancing the GHG reduction goals together with the need for feasibility and cost-effectiveness. If the State can translate these analytical results into feasible and cost-effective paths forward it would be beneficial to agencies striving to reduce emissions.
3. We recognize that the VMT/GHG reduction strategies were evaluated as scenarios for analysis purposes only, without implying any commitment to specific actions or policies. It would be helpful if the State could evaluate the feasibility and implications of each strategy. Some of our specific observations on the analysis results in Table 17 include:
  - a. Road pricing strategy – The transportation industry has long known that the amount of travel is connected to the cost of travel. The assumption of a 75% increase in auto operating cost (16 cents per mile) is a very high cost assumption, and would be equivalent to an extra \$4.00 in the cost per gallon of gasoline, assuming an average fuel economy of 25 miles per gallon for the auto fleet. Caltrans is aware of the challenges of just modest increases in the gas tax, and this would be an order-of-magnitude increase beyond that. We believe that it would be more realistic to use one of the lower cents-per-mile scenarios in Table 4 of Appendix B of the report. Even the 2-cents per mile would be equivalent to a still very aggressive 50 cent charge per gallon of gasoline, yielding a 2.8% reduction in VMT.
  - b. Transit service improvements – A doubling of transit service, doubling of transit speeds, free transfers, and reduced wait times would also seem to be overly optimistic. We understand that this use of aggressive service improvements is a sensitivity test, but some of the assumptions used would not be consistent with the feasibility intent of AB 32, particularly the assumption of transit speeds being doubled. The reduction of 6% in VMT is not likely achievable.
  - c. The reductions in VMT for the doubling of bicycle and pedestrian shares (0.41% and 0.43%, respectively) seems reasonable, given that these trips tend to be short.
  - d. Increasing the carpool occupancy requirements from minimum 2+ to 3+ would significantly increase freeway congestion and will likely not be feasible from a public acceptance standpoint for many segments. Each segment would need to be evaluated on a case-by-case basis.
  - e. As stated on Page 90 of Chapter 7, *“road capacity enhancing strategies were rejected due to concerns these would ultimately increase VMT.”* It would have been useful if

highway improvements had also been analyzed, given that such improvements in growing areas will still be needed to keep traffic on our network moving. We need a robust highway network to remain nationally and internationally competitive from a logistics standpoint. It should be noted that VMT has increased in California at the same time that air quality has been dramatically improved over the last several decades. The same thing could be true with our GHG reduction strategy if we do it right. We can achieve both GHG reduction and mobility/economic development goals, even if VMT should increase in some of the faster growing areas of the state. A significant portion of the San Bernardino County employment is related to logistics, and maintaining mobility is critical to job retention and creation in that sector. Individual transportation projects may increase VMT, but they may be very necessary from a mobility standpoint. It is the net result at the regional and statewide level that is most important, not the effect of an individual project that may be critically needed to address mobility issues.

- f. Land use – we recognize that the CTP 2040 did not analyze land use because, as stated in the CTP, land use is under the purview of local and regional agencies. However, it would be valuable to provide some examples in the report of quantification of GHG reduction from land use strategies, given the policy statements that refer to GHG benefit. SANBAG is supportive of TOD, but successful TODs will be dependent on market readiness. The CTP 2040 should take into consideration that we can create the conditions to facilitate TOD, but that the market will control how much TOD can actually occur in given areas. The dissolution of redevelopment agencies has set back the efforts of our local agencies trying to create TOD-ready environments. The CTP 2040 should stress the importance of funding that will allow agencies to better perform this important function.
4. Freight - Policy P2-S7 on Page 71 states *“Seek creation of national, state, and regional dedicated funding programs for freight transportation.”* SANBAG heartily concurs with that policy. As a national leader in freight movement, Southern California needs to maintain a robust freeway network and feeder systems (interchanges, arterials, and first/last mile connections) to major logistics centers and intermodal facilities that make their home here. At the same time, on Page 122, the CTP contains a recommendation to *“Avoid funding projects that add road capacity and increased maintenance costs.”* This recommendation seems to counter to the stated need to maintain mobility for freight, and Caltrans should consider removing the statement from the CTP 2040.
  5. Highway capacity - The addition of highway capacity is vital to accommodating the movement of freight and the growth in this sector that the CTP, itself, anticipates. The first line of Table 10 states: *“Total shipments by weight (into, out of, and within CA) are projected to grow approx. 180% statewide between 2012 and 2040.”* This is enormous growth, yielding economic benefits that we must seek to accommodate. Statistics are also provided on high future population growth rates for inland counties (Table 8). The SCAG RTP/SCS and other RTPs throughout the state have substantial capacity-related projects that

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are needed to keep Southern California (already the most congested urban area in the U.S.) functional from a mobility standpoint. The survey data cited in Figure 6 reinforces the importance of dealing with congestion. The two greatest concerns the public has about travel are highway congestion and the cost of travel (e.g. auto operating cost). Transit and non-motorized modes play an important role, but improving the highway system cannot be neglected, and this point should be acknowledged in the CTP.

HOV lanes - Page 94 of the CTP states: *"Based on discussions with the TAC and PAC, it was assumed that the completion of the statewide HOV network will not result in additional highway capacity; rather, new HOV lanes will be converted from existing mixed flow lanes. These new HOV lanes will be primarily added in interregional corridors so carpool vehicles can travel on HOV lanes in a seamless manner between regions. Text on Page 150 further states: "Based on consultation with the CTP TAC and PAC, no new freeway lanes will be added; mixed flow traffic lanes will be converted to HOV in all cases."* A policy of this nature would run counter to long-standing practice throughout the state, would significantly increase congestion, and would be met by strong public opposition. The highly controversial "take-a-lane" experience on the Santa Monica freeway several decades ago taught transportation agencies important lessons on how to implement an HOV network, the foremost lesson being, never take a general purpose lane in a congested corridor.

6. Page 94 also states that *"The CTP 2040 assumes implementation of fully utilizing the existing capacity in the HOV and HOT lanes for complete system operational efficiencies."* The statement implies that even toll express (HOT) lanes need to be carved out of existing capacity. It should be noted that the SCAG RTP/SCS contains a network of express lanes, none of which take a general purpose lane away. This network benefits freight and the general public, not just those able to pay a toll. We respectfully request that the language in the CTP be modified.
7. The goal of 80% reduction in GHGs is met only by Alternative 3, as explained in Chapter 7. Fuel efficiency and related fuel/vehicle technology improvements account for  $\frac{3}{4}$  of the reductions needed to reach the 80% target by 2050, per Table 23 of the CTP. The other strategies listed in Table 17 account for the other  $\frac{1}{4}$  of the reductions needed. We support the types of transportation strategies described in Chapter 7, as well as transit oriented land use strategies, wherever practical. However, we respectfully request that Caltrans re-look at some of the assumptions that may not be consistent with the feasibility criteria in AB 32, as stated earlier, as an even greater portion may be needed from vehicle and fuels technology than identified in CTP 2040.

In closing, we fully appreciate the challenge that the Caltrans and CARB analysts were facing in conducting this analysis. It has been a very difficult, yet useful and important exercise. It is a first step to determining how, in practical terms, the State and its public and private sector partners can go about addressing the ambitious goal of 80% GHG reduction reflected in the Executive Orders.

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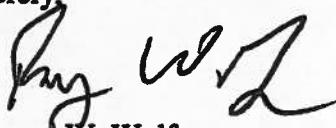
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It is important to define an achievable path to GHG reduction that both the broad array of public agencies and the private sector can endorse. The CTP 2040 can set the stage for this type of pragmatic collaboration. It can bring together both the "top down" 80% goal with the "bottom up" analysis of feasibility. Work is still needed from both ends of the spectrum, and we view the CTP 2040 to be important vehicle for continuing that discussion.

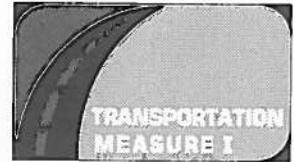
It should also be noted that achieving the GHG reduction goals in the transportation sector will be greatly dependent on the choices made by individuals and businesses (e.g. through buying zero and near-zero emission vehicles, modifying travel choices, creating fueling infrastructure, choosing locations for homes and businesses, etc.). It will be critical to understand these market dynamics as we collaboratively define a path forward on GHG reduction, in a way that is balanced with the economic needs of San Bernardino County and the remainder of the state.

We look forward to a continuing partnership in creating a mobile, sustainable, and economically vibrant California.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray W. Wolfe". The signature is fluid and cursive, with a large initial "R" and "W".

Raymond W. Wolfe  
Executive Director



Mr. Malcolm Dougherty  
Director  
California Department of Transportation  
P.O. Box 942873  
Sacramento, CA 94273-0001

**RE: Comments on the Draft 2015 Interregional Transportation Strategic Plan**

Dear Director Dougherty:

San Bernardino Associated Governments (SANBAG) appreciates this opportunity to offer comments on the draft California Interregional Transportation Strategic Plan (ITSP). SANBAG is the Council of Governments and Transportation Commission for the County of San Bernardino. Our interest in the ITSP stems from the significant mileage of interregional highways in our county covering a vast rural land area.

San Bernardino County is the largest county geographically in the continental United States (over 20,000 square miles) and a gateway for freight into and out of Southern California. Some of the highways carrying significant amounts of interregional traffic include:

- Interstate 10 (39 miles in San Bernardino County)
- Interstate 15 (189 miles)
- Interstate 40 (154 miles)
- U.S. 95 (80 miles)
- U.S. 395 (70 miles)
- State Route 18 (61 miles)
- State Route 58 (35 miles)
- State Route 62 (131 miles)
- State Route 138 (LA County Line to I-15 – 15 miles)

We greatly appreciate the attention given to freight in the ITSP, given the importance of logistics to the economies of the State of California and San Bernardino County. Much of our economy depends on the ability to move goods efficiently and safely within and through our area. We also appreciate the investment the State has made over the years to keep these important regional routes functioning. You have made very significant investments in the past, and it is important that these investments continue into the future as the need for the movement of goods expands. We offer the following comments:

1. The primary message of our comments is that investment in interregional highways in California is critical to keeping our state economically competitive.

MD150608 - SS

This is particularly important for San Bernardino County, with many miles of interregional highways and with the logistics industry as a major portion of our economy. As our county and the logistics industry grow, we need to address freight bottlenecks and other highway capacity needs on these major routes into and out of Southern California. Page xviii of the ITSP states that *“there is also a high likelihood that cap and trade revenues in the future may be applied to the interregional freight system.”* This is an intriguing concept and bears further consideration. Bottlenecks at upgrades with heavy truck volumes remain an issue in San Bernardino County, and these would potentially be appropriate Interregional Transportation Improvement Program (ITIP) investments using cap and trade funds or other traditional state sources.

2. We think the linkage described between the ITSP and the California Freight Mobility Plan (CFMP) is a good one. SANBAG was very involved in the development of the CFMP and was represented on the California Freight Advisory Committee (CFAC). The CFMP is a reasonable basis for prioritizing investment in the interregional highway system that serves freight.
3. The map of Strategic Interregional Corridors (Figure 1 of the ITSP) seems appropriate as a way to define priority corridors. However, there are some additional state highways in San Bernardino County where ITIP investment may be warranted and that are listed as authorized for investment under Section 164 of the California Streets and Highways Code. The ITSP should make clear that an interregional state highway that does not appear on the Strategic Interregional Corridors map is not precluded from ITIP investment. There may be occasions when the State has compelling reasons to make an ITIP investment on a highway that is not on the map but is on the Section 164 list.
4. The bottom of page 139 contains the essence of the ITSP’s discussion on funding priorities for the ITIP:

*To make the most of limited ITIP funding, this Plan recommends that ITIP investments are focused to activities of greatest interregional merit as follows:*

- *For the movement of people, and in a manner generally consistent with Caltrans’ updated Mission Statement and to provide a safe and sustainable integrated system, this will generally mean using ITIP revenues to improve and expand the state’s intercity rail system along the Strategic Interregional Corridors outlined within this Plan. For the purposes of this Plan, interregional rail system travel is defined to be that which a typical passenger travel trip is greater than 90 miles for the system as a whole.*
- *For the movement of goods, and in a manner generally consistent with Caltrans’ Mission Statement as discussed above, this generally means using ITIP revenues to improve interregional facilities (usually roads) of greatest interregional freight movement merit. For the purposes of the ITSP, highest freight movement is defined as underdeveloped routes carrying a high percentage (60 percent or higher) number of five-axle long haul trucks within the study areas.*

Please note that there are conflicts between what page 139 states and what the Executive Summary states (page xix) in these two bullet points. We are assuming that the Executive Summary contains the intended language and that page 139 will be modified to match it. In the second bullet point, it would not be appropriate to use a truck percentage, as major freight routes have lower truck percentages, but usually much higher total truck volumes. Use of the CFMP network, as stated in the Executive Summary, is more appropriate. In the first bullet, the trip length is different than in the Executive Summary, and the Executive Summary also expands on the difference between commuter rail and interregional rail. We have some additional comments on that bullet in point number 8 below regarding the relationship between Metrolink and the State High Speed Rail system.

5. On page 142 under the Economy section there is reference to a threshold of 15 percent as a significant volume of trucks (relative to total traffic). It should be noted that there may be occasions where a critical freight bottleneck needs to be addressed on an interregional roadway on which the truck percentage is less than 15 percent. This could occur on a roadway that has very heavy truck volume but also heavy total volume. SANBAG suggests that the 15 percent threshold be eliminated so that this does not appear to limit the State's flexibility in addressing the most important freight capacity needs, even those on interregional roadways that have a lower truck percentage.
6. There is a list of example projects/outcomes on page xx of the ITSP Executive Summary. As most of the examples are from central and northern California, we would appreciate an additional southern California example and would suggest a bullet such as: bottleneck relief and truck climbing lanes on I-10 and I-15.
7. Some of the freight projects in the CFMP represent solutions for bottlenecks on the highway network that will particularly benefit freight at the fringes of the urban areas. These types of projects should not be ruled out for inclusion as future ITIP investments. For example, Figure 7 in the ITSP shows a map of the Interregional Road System (IRRS). The gray shaded area shows the urbanized areas, and the map shows the IRRS terminating at the western end of I-10 in an area near Beaumont. In actuality, I-10 forms the boundary of the urbanized area for portions between Beaumont and Redlands. It would seem reasonable that I-10 on the IRRS could be considered as extending further west to approximately Redlands, and this would still be consistent with California Streets and Highways Code Section 164. In other words, the IRRS should extend several miles into San Bernardino County on I-10. We point this out because one of the more significant truck grade bottlenecks on I-10 is in this area, impacting interstate goods movement.
8. Regarding passenger rail, the State should recognize in the ITSP that its High-Speed Rail system is dependent on passengers getting to that system. This is one of the reasons that a Memorandum of Understanding was executed between the California High Speed Rail Authority (CHSRA), SCAG, Metrolink, and the County Transportation Commissions (CTCs) of Southern California. The MOU

Malcolm Dougherty

June 8, 2015

Page 4 of 4

identifies a "Prioritized Rail Improvement List" (PRIL) that will be utilized to develop a funding plan for improvements on the rail network that will support the HSR system. The CHSRA also made a commitment to funding of those improvements in paragraph 10b: "*CHRSA will commit an additional \$1billion consisting of unallocated Prop 1A funds and any other funding sources to implement the PRIL projects that meet the performance criteria identified in the Attachment B by 2020.*" The ITSP is an appropriate place to clarify that some of the rail feeder network is critical to helping the state HSR system succeed and that selected portions of this network may be appropriate as ITIP investments.

We appreciate the opportunity to comment on the draft ITSP.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Wolfe". The signature is fluid and cursive, with the first name "Ray" and the last name "Wolfe" clearly distinguishable.

Raymond W. Wolfe  
Executive Director



April 23, 2015

Clerk of the Board  
California Air Resources Board (CARB)  
1001 I Street  
Sacramento, CA 95814

Attention: Clerk of the Board

**RE: Comments on CARB's Sustainable Freight – Pathways to Zero and Near Zero Emissions – Discussion Draft & the Draft Heavy Duty Technology and Fuel Assessment Overview**

Thank you for the opportunity to comment on the *Sustainable Freight – Pathways to Zero and Near Zero Emissions - Discussion Draft and the Draft Heavy Duty Technology and Fuel Assessment Overview*. As the nation's premier international trade gateway, the Southern California Association of Governments (SCAG) and our partner transportation agencies plan for investments designed to ensure that the region continues to play a vital role in the global supply chain while attaining clean air standards and quality of life for our communities. Consistent with our adopted 2012-2035 Regional Transportation Plan/Sustainable Communities Strategies, we are supportive of a strong commitment to reduce emissions from transportation sources through the broad deployment of zero and near-zero emission technologies. The 2012-2035 RTP/SCS serves as transportation strategies and control measures for the South Coast Air Quality Management Plan and demonstrates transportation conformity for all nonattainment and maintenance areas within the region.

Clean transportation strategies are critical to achieve air quality attainment, meet greenhouse gas (GHG) reduction targets, and improve the health of our local communities. It is also important that these technologies have real potential to provide economic benefits—demonstrating, for example, reduced fuel and maintenance costs and greater energy cost certainty to ensure economic sustainability. Transitioning our freight transportation system to cleaner, more efficient technologies and strategies will require coordinated partnerships with private industry (carriers, shippers, technology and energy providers, etc.) as well as local and

regional agencies and the federal government. We hope to work closely with CARB to achieve this vision of an environmentally and economically sustainable freight system and offer the feedback below:

- **Funding:** Although CARB staff has identified existing funding sources and has described plans to modify existing incentive sources, further delineation of new funding opportunities is needed. More emphasis needs to be placed on the importance of a robust funding mechanism to not only support emerging technology demonstration and deployment, but also integration of infrastructure. Further, more emphasis should be placed on fostering federal support to encourage broader nationwide markets for clean technologies—a necessity for major vehicle manufacturers to justify clean technology research and development investments; substantial federal funding is needed for technology development and initial deployment incentives. We appreciate the acknowledgment on page 1 of the report indicating that, “to help fund these efforts, California’s logistics industry must remain profitable in the face of increasing competition from other North American seaports and supply chains.” We would further caution that increasing transportation and operational costs in California could have unintended consequences. For example, regulations on GHG reduction that influence industry to move portions of the supply chain out of California could be a net negative for global GHG reductions, even though on paper California GHGs might decrease. This could undermine the very source of funding needed to continue with technology improvements.
- **Industry Considerations:** We appreciate the outreach conducted to date with private industry. However, we strongly encourage CARB staff to maintain a continuous dialogue with industry and to be cognizant of operational considerations. As described in the document, the freight industry is complex with multiple players and markets. Interfering with operations may slow productivity, with potential negative economic consequences. Strategies need to be vetted through technology demonstrations. Although local, state, and federal public agencies should support such demonstrations, private industry must be engaged early and often. This is particularly important in relation to the discussion of proposed facility caps; improvements to system efficiency; selected near term actions that are proposed; and the overall approach towards regulation. Since cost, safety and operational issues are dominant considerations, priority should be given to developing strategies with potential environmental *and* economic benefits.
  - **Facility Based Caps:** CARB staff has already noted many potential difficulties in implementing a facility cap. We point out the additional consideration of potentially penalizing facilities that have already made voluntary investments to clean the air. Further, even within a single industry or types of facilities, there are multiple markets and variations in operational considerations that will make it challenging to

impose a broad, one-size-fits-all approach. We also caution that while reducing emissions is a worthwhile goal, any caps that result in reduced activity or productivity would be harmful to the State's economy. We encourage CARB to continue to work closely with industry in evaluating the benefits and costs of such caps.

- **System Efficiency:** Many strategies are discussed, including urban consolidation centers, extended or off peak hours of operation, land use strategies and increased terminal efficiencies. We remind CARB staff that many of these efforts have been tried to varying levels of success. While some show promise, industry may be the best judge of how to improve the efficiency of their operations given the implications on the broader supply chain. CARB staff should maintain ongoing dialogue with industry, as well as local and regional transportation agencies that have made considerable effort to understand and coordinate with operators to facilitate transportation and land use planning.
- **Near Term Measures:** Some of the proposed near term measures related to increasing enforcement will require time and cooperation from industry. While increased enforcement is important to ensure that existing regulations are being implemented properly, CARB staff should work closely with industry to ensure that this is not a burdensome process.
- **Regulatory Approach:** In general, we support an approach that requires certain targets be met as opposed to requiring a specific technology. It is important to allow industry the flexibility to arrive at emissions reducing solutions that best support their business practices. Both deployment incentives and regulatory measures should generally be fuel and technology neutral and allow maximum choice for industry.
- **Federal-Source Emission Standards:** As described in the report, NO<sub>x</sub> emissions from federal and international sources such as ocean-going vessels and locomotives will represent an increasingly significant portion of the NO<sub>x</sub> emission inventory in the future. To attain existing and future federal and state ambient air quality standards in the SCAG region, especially in the South Coast Air Basin, it is necessary that federal actions ensure a level playing field. While we support CARB's near-term actions to petition U.S. EPA to develop lower NO<sub>x</sub> standards, we caution CARB about pursuing California specific emissions standards in the absence of federal action.

- **Land Use and Transportation Infrastructure Considerations:** CARB describes a few approaches to improving the efficiency of the freight transportation system that will have implications for infrastructure planning such as truck platooning and connected vehicles. In these efforts, CARB should work closely with CALTRANS, MPOs and local transportation planning agencies.
- **Regional Planning:** CARB staff suggests incorporating freight into the Sustainable Communities Strategies, and using metrics to measure changed vehicle miles traveled and greenhouse gas emissions as a result of the plan. Although SCAG develops a comprehensive freight strategy in coordination with the development of the Regional Transportation Plan and Sustainable Communities Strategies, the breadth of data and analytical tools needed are often resource intensive and challenging to acquire. In addition, SCAG and its public agency partners have very limited ability to influence freight-related emissions. We can account for the emissions-related actions of the state and federal governments, but it would not seem appropriate to include freight-related GHG reduction as a responsibility of MPOs through the SCS process. CARB is advised to further coordinate with MPOs throughout the State with respect to initiatives focused on regional planning considerations.

Comments specific to the *Draft Heavy Duty Technology and Fuel Assessment Overview* are below:

- **Building on Regional Progress:** The *Draft Heavy Duty Technology and Fuel Assessment Overview* acknowledges that different parts of the State have different fleet mixes, have different industry needs, and have made different investments to date. As home to the nation's two largest ports and the gateway for about 40 percent of the nation's containerized imports, we have done extensive work to demonstrate and deploy new technologies through regional collaboration. We hope that as the State begins to implement new policies, investments already made in the SCAG region are leveraged and built upon. Furthermore, we suggest that the document clarify the critical role of MPOs as a key partner in understanding and developing regional freight plans.
- **Technology Assessment:** The technology assessment should be more comprehensive in identifying and comparing emerging technologies. Consistent metrics should be used to compare across technologies such as stage of development, estimated incremental cost, return on investment, most likely users and markets, emissions benefits, and operational parameters.
- **Technology Prioritization:** This report suggests that investments will be prioritized. As previously stated, the SCAG region generally maintains a technology neutral approach, but where needed, we strongly recommend clear and transparent criteria.

- **Transition from Near-Zero to Zero:** The report suggests that near-zero emission technologies will be used as bridging technologies as fully zero emission technologies become developed *OR* will be used for equipment or vehicles where no zero-emission option is likely to exist. We recommend that CARB staff provide greater clarification of this transition. We are concerned about the potential for stranded assets as new technologies and standards continue to evolve.

The SCAG region offers these comments to facilitate collaboration with CARB in developing the full Sustainable Freight Strategy. We acknowledge that success in this effort will require cooperation between sectors and jurisdictions. California cannot solve these problems alone, and this report serves in part as an opportunity to solicit greater federal participation in realizing a necessary solution. Any actions taken must be understood and balanced in the context of a larger geography than just California, and evaluated across multiple dimensions: air quality, productivity, health, economic competitiveness, and employment opportunities for our citizens, many of whom are dependent on logistics for their livelihood. Feasible *and* cost-effective approaches are of paramount importance if we are to succeed going forward. We have been fortunate to have a strong partnership with industry on air quality issues in Southern California, and we need to build on that with solutions that are sensitive to keeping California competitive and our businesses healthy.

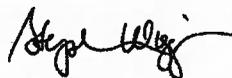
Once again, thank you for the opportunity to review CARB's draft documents.

Sincerely,




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Mark Baza  
Executive Director,  
Imperial County Transportation  
Commission




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Stephanie Wiggins  
Interim Deputy Chief Executive Officer,  
Los Angeles County Metropolitan  
Transportation Authority




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Darrell Johnson  
Chief Executive Officer,  
Orange County Transportation Authority




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Kristin Decas  
Executive Director,  
Port of Hueneme



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**Jon Slangerup**  
Executive Director,  
Port of Long Beach



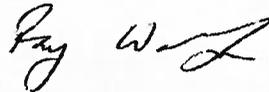
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**Gene Seroka**  
Executive Director,  
Port of Los Angeles



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**Anne Mayer**  
Executive Director,  
Riverside County Transportation  
Commission



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**Raymond Wolfe, Ph.D.**  
Executive Director,  
San Bernardino Associated  
Governments



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**Hasan Ikhata**  
Executive Director,  
Southern California Association of  
Governments



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**Darren Kettle**  
Executive Director,  
Ventura County Transportation  
Commission



The San Bernardino Countywide Vision is a centerpiece of our sustainability activities. The Vision was adopted by the County of San Bernardino and SANBAG in June, 2011, even prior to the approval of the 2012-2035 RTP/SCS. It is very consistent with the direction of the RTP/SCS and gave San Bernardino County an important foundation for the activities listed in the Sustainability MOU. Extensive information is available on the Countywide Vision site at <http://cms.sbcounty.gov/cao-vision/Home.aspx>. The status report on our MOU activities is provided as Attachment 1 to this letter, and a copy of the MOU is included along with the status report.

## **OVERALL PERSPECTIVES ON THE 2016 RTP/SCS**

Prior to the more detailed comments, SANBAG has some suggestions for how the RTP/SCS can be used to achieve the mobility, safety, and sustainability goals of the region in the coming years. These comments relate to our own Countywide Transportation Plan, funding issues, transit service and transit oriented development (TOD), and greenhouse gas (GHG) reduction.

### **SANBAG's Countywide Transportation Plan and Relationship to the 2016 RTP/SCS**

SANBAG recently completed its Countywide Transportation Plan (CTP) and provided it to SCAG as background and input to the RTP/SCS. The CTP analyzed two future scenarios: a "baseline scenario" that assumed traditional revenue sources (generally consistent with what the RTP/SCS defines as "core revenues") and an "aggressive scenario" (generally consistent with RTP/SCS "Plan" revenues, including the innovative sources identified in the Plan).

The projects and programs in the aggressive scenario of SANBAG's CTP are consistent with the lists in SCAG's 2016 RTP/SCS. In addition, the jurisdiction-level growth forecasts for the CTP are consistent with the jurisdiction-level growth forecasts for the RTP/SCS. SANBAG has provided SCAG with technical corrections to the San Bernardino County portion of the RTP/SCS project list in a separate communication so that the changes can be incorporated into the modeling for the final RTP/SCS. It should be noted that agreement was reached in 2015 for the Los Angeles World Airports to transfer control of Ontario International Airport (ONT) to the Ontario International Airport Authority (OIAA). SANBAG and our partner agencies appreciate the regional support that has been provided by SCAG and other agencies around the region. We look forward to continuing local and regional efforts to make ONT a truly regional asset.

SCAG also indicates that the Program Environmental Impact Report (PEIR) for the RTP/SCS may be useful as a basis for streamlining CEQA clearance for certain types of projects. SANBAG looks forward to collaborating with SCAG to take advantage of this opportunity, where possible.

### **Funding Issues**

Although the SCAG innovative revenue sources are projections of "reasonably available" revenue under the federal definition, much is unknown about how these will play out in the long run. In terms of project implementation, SANBAG bases its programs and budgets on the core

revenues, but will be working with SCAG, the State, and federal agencies on options to 1) derive the most benefit from the funds that have been entrusted to us by the public, 2) seek additional State and federal funding for projects that are of statewide and national significance (e.g. expansion of highway facilities that serve international goods movement), and 3) work with policy makers to determine if and when additional funding is needed and ways to provide that funding so as to minimize taxpayer burdens and fairly distribute project funding. Transportation infrastructure is fundamental to our competitiveness as a county and as a region. Infrastructure represents an asset that needs to be protected and invested in to sustain our economy, a significant portion of which is logistics-based. At the same time, it must be acknowledged that support for the overall RTP/SCS financial plan does not imply support for any individual piece of legislation related to the funding of transportation projects.

Fixing America's Surface Transportation Act (FAST Act) recently passed by Congress is an opportunity to continue to upgrade our transportation infrastructure, as it provides a stable source of federal revenue and includes a revenue stream for freight projects that are critical to San Bernardino County's economy. We believe that the regional freight collaboration that has worked so well for our regional project funding through the State's Trade Corridor Improvement Fund (TCIF) program should be re-invigorated to craft a program of projects that can be most competitive for these new federal freight program funds.

As highlighted in the RTP/SCS, a future funding mechanism based on vehicle miles of travel (VMT) is viewed to be one of the most significant innovative funding sources for the future. SANBAG has provided comments to the California Transportation Commission related to the SB 1077 "Road Charge" pilot program. One of our comments was that, depending on the results of the pilot, the State should consider phasing in this program, beginning with alternative fuel vehicles. We recognize that the State has accelerated the schedule for the Road Charge pilot, but it should not be at the expense of taking shortcuts or skipping steps that are important to designing an ultimate program that has a high probability of success. This is potentially a very complex program, and it is more important to do it right than to do it fast. SCAG can play an important role in suggesting ways to make this transition successful and acceptable to the public if, in fact, the pilot program concludes that replacement of the gas tax with a road charge is a viable path forward.

### **Transit Service and Transit Oriented Development (TOD)**

As highlighted in Attachment 1, SANBAG and our partner agencies are investing heavily in passenger rail and premium bus services. Capital investments for premium transit, including rail and bus rapid transit (BRT) projects in the San Bernardino Valley will exceed \$600 million in the decade beginning in 2012. This will enable the planning and implementation of more transit-oriented development in the Valley subarea of the County.

This is a bold step for San Bernardino County, and we look forward to partnering with SCAG to encourage the State to invest in the suburban portions of the transit system, not just the more urban portions. San Bernardino County jurisdictions are supportive of TOD, but need additional flexibility from the State if we are to be able to compete for funding under the Affordable

Housing/Sustainable Communities (AHSC) program and related cap-and-trade programs. SANBAG and the County of San Bernardino have been involved in commenting on the AHSC grant guidelines which, unfortunately, are not friendly to TOD in suburban areas such as the Inland Empire, even though densities are increasing. Transit headways and density requirements for the TOD portion of the AHSC program are still too stringent for the Inland Empire market, even around passenger rail stations. That said, several of our local jurisdictions have built and are pursuing TOD projects around Valley transit stations at densities the market can support. Our jurisdictions also need enabling tools to lay further groundwork for TOD, in light of the dissolution of redevelopment agencies (RDAs) several years ago. In summary, we are highly supportive of transit/TOD development, but need additional help if our local jurisdictions are to be successful.

### **Greenhouse Gas (GHG) Reduction**

The 2016 RTP/SCS demonstrates that the SB 375 GHG reduction targets for the region are met for 2020 and 2035. SANBAG has been aggressively working on greenhouse gas reduction strategies and implementation within San Bernardino County through our Regional Greenhouse Gas Reduction Plan (now being implemented through individual city climate action plans), the Home Energy Renovation Opportunity (HERO) program, truck retrofit programs, and other energy/GHG-related initiatives. As highlighted in Attachment 1, we are being very proactive on sustainability and GHG reduction initiatives.

At the same time, it is important to recognize that we need a robust highway network to remain competitive from a logistics standpoint. A strong economy is required for both the private and public sectors to afford the technology needed to meet air quality standards and achieve the requisite GHG reductions. It should also be understood that a thriving economy in a growing county like San Bernardino can result in an increase in vehicle miles of travel (VMT). While we understand that reductions in VMT can be helpful to GHG reduction, it should be noted that VMT has steadily increased in southern California at the same time that air quality has been dramatically improved over the last several decades.

The same thing could be true with our GHG reduction strategy if we do it right. We can achieve both GHG reduction and mobility/economic development goals, even if VMT should increase in some of the faster growing areas of the State like San Bernardino County. The GHG analysis in the draft 2040 California Transportation Plan demonstrated that vehicle and fuels technology will be the primary way in which GHG reduction goals will need to be met. VMT reduction is an appropriate goal, but technology will be the principal path to long term GHG reduction. See SANBAG's comments on the draft 2040 California Transportation Plan, previously provided to SCAG.

We make this point because individual transportation projects may increase VMT, but these projects are very necessary from a mobility standpoint. In terms of GHG reduction, it is the net result at the regional and statewide level that is most important, not the effect of an individual project. In other words, because SB 375 GHG reduction is evaluated at the regional level, individual transportation projects should not be held to a GHG reduction or VMT reduction

standard. We request that SCAG keep that in mind in ongoing discussions with the air districts, the California Air Resources Board, and other state agencies. SANBAG strongly supports initiatives to advance vehicle and fuels technology and to see that technology penetrating into the fleets of light duty and heavy duty vehicles. This is the path to success in GHG reduction for mobile sources.

## **SPECIFIC COMMENTS ON THE RTP/SCS AND PEIR**

### **Comments on the RTP/SCS**

1. Page 22 – It would be useful to provide the definition that SCAG uses to distinguish single family vs. multi-family
2. Page 23, Exhibit 2.1 – Putting county boundaries on the map would be helpful for geographic perspective
3. Page 40 – Legend – The blue dot may be better labeled “Transit Centers”
4. Page 41 – For I-10 widening, add the word “westbound” to the description; for Downtown San Bernardino Transit Center, add “and Metrolink extension” since the text mentions the extension. Also, under Omnitrans E Street sbX state: “A 16-mile bus rapid transit project ...”
5. Page 43, grant no. 50 – add “and Safe Routes to School Study” to the description.
6. Page 48 – it would be helpful to add definitions of “distressed,” “failed condition,” “functionally obsolete,” and “structurally deficient” in the text or on the graphic.
7. Page 50 – Preserving our Transportation System - SANBAG agrees with stressing the importance of system preservation. The statement on Page 50 says: *“Moving forward, the region needs to continue to make “fixing it first” a top priority – that is, focusing its funds on preserving the existing transportation network prior to investing in system expansions. Failing to adequately invest in the preservation of Southern California’s roads, highways, bridges, railways, bicycle and pedestrian facilities and transit infrastructure will only lead to further deterioration, which has the potential to worsen our congestion challenges.”* Page 79 further references the consideration of life-cycle costs beyond construction.

However, it should be noted that “prior to investing in system expansions” does not mean that capital projects can be put on hold while maintenance funding catches up to a defined state of good repair. Both need to proceed in parallel. A possible re-phrasing could be: *“focusing the necessary funds on preserving the existing transportation network while strategic investments are made in system expansions.”*

In addition, identification of a regional need for system preservation funding does not imply that a regional or sub-regional entity will be responsible for raising the funds needed for system preservation. Responsibility for system preservation funding will still need to rest with the facility owner except in cases where maintenance/operations costs are explicitly identified in agreements between the owner and a third party (e.g. an operator of express toll lanes). Caltrans needs to remain responsible for the funding of maintenance and operation of state highways, and local jurisdictions need to remain responsible for local roads. It is suggested that this clarification be added to the text.

8. Page 50 – Logistics Epicenter – The last paragraph on the page states that 750 million of the 1.2 billion square feet of industrial space is occupied. This seems like a low percentage of occupied square feet. Please clarify.
9. Page 95 – The first paragraph under Highways and Arterials states: *“Active transportation has grown in recent years, but the majority of trips in our region today is still made on our region’s highways and arterials. Yet, the expansion of our highways and arterials has slowed down over the last decade. Revenue from traditional sources to fund transportation improvements is declining and costly expansions to address congestion are no longer financially feasible. However, given that critical gaps and congestion chokepoints still exist within the network, improvements beyond TSM and TDM strategies need to be considered. Closing these gaps to complete the system will allow residents and visitors alike to enjoy improved access to opportunities such as jobs, education, recreation and healthcare.”* Please change *“are no longer financially feasible”* to *“may not always be financially feasible”* or similar language. Many transportation improvements are costly, but they are also important to regional mobility and the economy and are also financially feasible.
10. Page 95 near the bottom of the page states: - *“The 2016 RTP/SCS highways and local arterials framework and guiding principles are summarized here:*
  - a. *Focus on achieving maximum productivity through strategic investments in system management and demand management.*
  - b. *Focus on adding capacity primarily (but not exclusively) to:*
    - i. *Close gaps in the system; and*
    - ii. *Improve access where needed.*
  - c. *Support policies and system improvements that will encourage the seamless operation of our roadway network from a user perspective.*
  - d. *Any new roadway capacity project must be developed with consideration and incorporation of congestion management strategies, including demand management measures, operational improvements, transit and ITS, where feasible. Focus on addressing non-recurring congestion with new technology.*
  - e. *Support complete streets opportunities where feasible and practical.”*

SANBAG concurs with this language. While we are aggressively pursuing sustainability initiatives, as described earlier, highway capacity improvements are also needed particularly to support the mobility improvements required to sustain economic growth. This is particularly important for the movement of freight, as the logistics sector supports about one third of San Bernardino County’s economy.

### **Comments on the PEIR**

The PEIR is comprehensive and very well done overall.

- PEIR, page 3.3-42 – The next-to-last paragraph on this page states that “the 2016 RTP/SCS aims to limit placing new growth within 500 feet” (i.e. within 500 feet of freeways). The actual statement on page 112 of the 2016 RTP/SCS is that *“SCAG shall pursue activities to reduce the impacts associated with health risks for sensitive receptors within 500 feet of freeways and high-traffic volume roadways.”* The PEIR statement should be revised to be consistent with the statement in the RTP/SCS. The RTP/SCS

does not seek to limit growth in any particular area. In addition, as this region gets closer to attainment, the air quality impact of high-volume roadways will diminish. One could argue that the 500-foot guideline established by CARB should also be reduced as air quality improves. SCAG should examine this relationship in future RTP/SCSs.

- **Table ES.4-1, Page ES-50, MM-TRA-1(a)(7):** The mitigation measure states that SCAG shall develop a vanpool program for employees for commute trips. Perhaps this is intended to apply only to SCAG employees, and if so, this should be stated. If not, the statement should be removed, as there are vanpool programs throughout the region already managed by other entities. However, SCAG could encourage development and expansion of vanpool programs.

As stated earlier, SANBAG appreciates all the efforts by the SCAG Regional Council and SCAG staff to make the 2016 RTP/SCS a reflection of where the region is headed over the next 24 years. We look forward to continuing partnerships with SCAG to implement the projects and programs in the RTP/SCS.

Regards,

A handwritten signature in black ink, appearing to read "Ray Wolfe". The signature is fluid and cursive, with the first name "Ray" and the last name "Wolfe" clearly distinguishable.

Raymond Wolfe  
Executive Director

**Attachment 1**  
**SANBAG Initiatives to Implement the 2012-2035 RTP/SCS**

The attachment provides a status report on the Sustainability Memorandum of Understanding (MOU) that SCAG and SANBAG jointly executed in early 2014. The MOU concerns “Collaboration between SANBAG and SCAG to Implement the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy,” and delineates a list of 16 activities demonstrating the commitment to implement the RTP/SCS. Although the 2016 RTP/SCS provides an overview of some of these activities region wide, it is useful to provide a more specific status report for San Bernardino County in SANBAG’s comment letter. A copy of the MOU is included at the end of this attachment.

In overview, SANBAG and our partner agencies are investing in a growing network of rail and high-capacity bus transit routes to serve our population and employment base. This will enable the planning and implementation of more transit-oriented development (TOD) in the Valley subarea of the County.

For example, the San Bernardino Metrolink line is the highest ridership line on the Southern California commuter rail system. The line is being extended to downtown San Bernardino by 2016, and a nine-mile Redlands Passenger Rail system will be in operation between San Bernardino and Redlands by 2020. We are also initiating project development on the double tracking of a Metrolink segment in Rialto. Additionally, we are working with SCAG on the Los Angeles and San Bernardino Inter-County Transit and Rail Connectivity Study to coordinate planning and implementation for the Gold Line and Metrolink services in this corridor, including consideration of rail to Ontario International Airport.

The E Street sbX bus rapid transit (BRT) system began revenue service in April 2014 between Loma Linda and Cal State San Bernardino, and an additional express bus/BRT line is being advanced serving the West Valley subarea (Fontana, Rancho Cucamonga, Ontario including ONT, Montclair, and Pomona). We also now have four transit hubs in the Valley: Montclair, Fontana, San Bernardino (completed in 2015), and Yucaipa. The collective investment in high-capacity transit (rail and bus) from 2012 through 2020 will be over \$600 million in capital improvements, not counting the commitment to transit operations. This is a very substantial investment in an upgraded transit backbone for San Bernardino County agencies.

Our local jurisdictions are fully supportive of these transit initiatives and understand the importance of affordable housing, infill development, and mixed-use, pedestrian-oriented development focused in transit station areas. We have been involved in commenting on the state’s Affordable Housing and Sustainable Communities grant guidelines which, unfortunately, are not friendly to TOD in densifying, but still suburban, areas such as the Inland Empire. Transit headways and density requirements for the TOD portion of the AHSC program are still too stringent for the Inland Empire market, even around rail transit stations. Yet several of our local jurisdictions have built and are pursuing TOD projects around Valley transit stations.

The following highlight progress for specific initiatives referenced in the MOU:

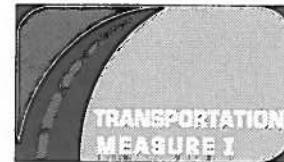
1. **Countywide Vision** - All elements of the Countywide Vision are in action and our efforts are moving us closer to achieving the goals of a complete county. We are partnering with local business and educators to help us produce an educated workforce capable of sustaining our economic prosperity in the future. We are partnering with state and federal resource agencies, water agencies, local jurisdictions, the business community, and advocacy groups to provide direction on habitat conservation and open space. The water agencies are coordinating to conserve and plan for the future of our communities and environment. The County and local jurisdictions have made substantial progress on the health and wellness element and are implementing the Community Vital Signs initiative. Extensive information is available on the Countywide Vision site at <http://cms.sbcounty.gov/cao-vision/Home.aspx>.
2. **Active Transportation** – SANBAG and our local jurisdiction partners have aggressively pursued funding for pedestrian and bicycle improvements countywide. As a result, we have received over \$40 million in state Active Transportation Program (ATP) grant funds in Cycles 1 and 2 of that program. This includes over \$4 million for projects identified in the: SANBAG/SCAG report: “Improvement to Transit Access for Cyclists and Pedestrians,” which are focused around the stations along the Metrolink San Bernardino Line. Many of these projects are now in design.
3. **Countywide Safe Routes to School Inventory** – This project has been completed through means of the SCAG Sustainability Grant Program. It has led to a subsequent ATP grant that will be conducting inventories of existing conditions and bicycle/pedestrian improvement needs at schools throughout the County.
4. **Conservation Planning** – SANBAG has been an active participant in SCAG’s regional conservation planning initiative leading up to the 2016 RTP/SCS. In addition, SANBAG and the County of San Bernardino completed Phase 1 of the Countywide Habitat Preservation/Conservation Framework in 2015 funded, in part, with a SCAG grant. The Framework is led by the Environment Element Group, consisting of a cross-section of resource agencies, water agencies, local jurisdictions, the business community, and advocacy groups. Phase II is beginning in early 2016.
5. **Additional Pedestrian/Bicycle initiatives** – SANBAG has initiated the “Points of Interest Pedestrian Plan.” This project is identifying bicycle/pedestrian improvements around major activity centers in San Bernardino County (e.g. shopping centers, office/mixed-use areas, other employment areas, colleges/universities, etc.). It will result in an update of SANBAG’s Non-Motorized Transportation Plan (to be retitled Active Transportation Plan), including a more robust treatment of pedestrians.
6. (6 and 7 reported jointly) **High Quality Transit Areas (HQTAs)**, including stations along the San Bernardino Metrolink Line – Exploration of TOD opportunities has now occurred on several existing and future transit corridors: Metrolink San Bernardino Line, Redlands Passenger Rail corridor, and bus rapid transit (sbX) lines in San Bernardino/Loma Linda (E Street) and Fontana/Rancho Cucamonga/Ontario/Montclair (West Valley Connector). Each of these corridors have HQTAs, and the demographic forecasts for these initiatives have been incorporated into the 2016 RTP/SCS growth forecasts. In the Metrolink corridor, the ARRIVE Corridor Study (ARRIVE = Advanced Regional Rail Integrated Vision - East) was completed, documenting specific land use,

infrastructure, and environmental challenges and associated strategies to encourage development at the six (soon to be seven) stations on our Metrolink line. A number of the challenges are related to site assembly, infrastructure readiness, and other market-related issues. The dissolution of redevelopment agencies (RDAs) has also dealt a serious blow to local jurisdictions being able to fund the types of economic and financial initiatives that are needed to lay the groundwork for TOD and infill development. Nevertheless, substantial TOD activity has occurred at the Montclair, Upland, and Rancho Cucamonga Metrolink stations. The ARRIVE Corridor study has explored public-private partnership models that may be of assistance in these areas. The specifics are documented in the ARRIVE Corridor Final Report, available at: [http://www.sanbag.ca.gov/planning2/study\\_arrive.html](http://www.sanbag.ca.gov/planning2/study_arrive.html).

7. Status included in Number 6.
8. Performance Measurement and Monitoring - Substantial progress has been made in performance measurement and monitoring processes since the adoption of the 2012 RTP/SCS. Community Indicators reports have been published through the Countywide Vision initiative. A travel time and congestion monitoring system (SANBAG iPeMS) has been implemented for arterial roadways on the Congestion Management Program (CMP) network. An update on the Community Vital Signs initiative can be found at <http://communityvitalsigns.org/>. SANBAG is also involved with SCAG in the further development of both the CALOTS/REVISION program (for monitoring land use activity and other community characteristics) and the Scenario Planning Model (SPM).
9. Complete Streets - SANBAG prepared a Complete Streets Strategy in 2015, supported in part by a SCAG Sustainability Grant. Appendix A of the 2015 update to the Non-Motorized Transportation Plan presents the results of that study, which can be found at: [http://www.sanbag.ca.gov/planning2/plan\\_non-motor.html](http://www.sanbag.ca.gov/planning2/plan_non-motor.html). The Complete Streets Strategy will help jurisdictions comply with Assembly Bill (AB) 1358, also known as the Complete Streets Act of 2008, which requires consideration of complete streets with any substantive revision to general plan circulation elements.
10. Funding and legislative initiatives – SANBAG has been proactively involved with Cap-and-Trade program funding opportunities that relate to the implementation of the RTP/SCS. This includes programs to fund transit capital improvements and operations (e.g. Low Carbon Transit Operations Program/LCTOP, Transit and Intercity Rail Capital Program/TIRCP, Affordable Housing/Sustainable Communities Program/AHSC, and Urban Forestry Grant Program). SANBAG regularly has provided comments on cap-and-trade grant guidelines to provide decision-makers with an understanding of the needs of San Bernardino County as we seek to address regional and statewide sustainability goals.
11. Clean energy for freight vehicles – SANBAG served as the lead agency on the acquisition of 204 natural gas trucks by Ryder and the construction of two natural gas fueling stations and one natural gas truck maintenance facility through state and federal grant programs. We are pursuing funding through a Caltrans Sustainable Transportation Planning grant to develop a strategy for implementation of clean fuels initiatives for both passenger vehicles and trucks. This will be an implementation element of the Climate Action Plans (CAPs) being approved by local jurisdictions subsequent to the Regional Greenhouse Gas Reduction Plan and EIR completed by SANBAG in 2014.

12. Progress reports – SANBAG has reported progress on the Sustainability MOU periodically at the CEOs sustainability Working Group and has provided periodic updates on sustainability initiatives to SANBAG policy committees. An overview of sustainability initiatives is provided in the SANBAG Countywide Transportation Plan.
13. Regional Sustainability Working Group – SANBAG has a seat at the Sustainability Working Group and regularly participates in these meetings.
14. San Bernardino County Active Transportation Network (SBCATN) – As stated in the MOU, the Network is a convening of county agencies, community organizations, residents and cities interested in improving the experience of and increasing facilities for walking and bicycling in San Bernardino County. The Network aims to: expand on the region's multi-modal planning efforts, especially for bicyclists and pedestrians; improve safety and accessibility for bicyclists and pedestrians; assist in the county implementation of the RTP/SCS; and further improve the quality of life in the county, including economic development, air quality, public health and connectivity. Meetings are held quarterly and have included walk audit tours as well as presentations on the activities of the partners.
15. Regional PEV Readiness Plan – SANBAG is seeking funding for more focused planning, facilitation, and implementation of plug-in electric vehicles. The SCAG PEV Readiness Plan is an important take-off point for these more focused efforts with the utilities, property managers, and funding partners.
16. Climate Action Plans – In 2014, SANBAG completed a 21-city partnership effort to develop a Regional Greenhouse Gas Emissions Inventory and Reduction Plan and its associated Environmental Impact Report. The Plan and EIR are being used as the foundation for the local jurisdictions' CAPs. Subsequent to the preparation of the regional Plan, SANBAG obtained a SCAG Sustainability Program grant to develop a set of Climate Action Plan implementation tools, including a model CAP for one of the participating cities that tiers off of the programmatic EIR. City councils in several cities have now adopted their CAPs.

Aside from the specific activities referenced in the MOU, it should be noted that SANBAG completed its Countywide Transportation Plan (CTP) in 2015. The CTP is built on a foundation of economic and environmental sustainability. It recognizes that mobility and smart land development are needed to sustain the economic growth and competitiveness necessary for survival within the global economy. This economic growth is needed, in turn, to fund the array of statewide and regional sustainability commitments. San Bernardino County must invest in all modes of transportation, including highways, to support its businesses and growing population.



Dr. Barry Wallerstein  
Executive Director  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Subject: San Bernardino Associated Governments' (SANBAG's) comments on the draft white papers for the 2016 Air Quality Management Plan (AQMP)

Dear Dr. Wallerstein:

This letter is in response to the opportunity being provided by AQMD for public comment on the draft white papers being prepared as background for the 2016 AQMP. SANBAG greatly appreciates the effort that went into the white papers and the opportunity afforded by AQMD to comment. The first part of the letter provides some general observations, followed by specific comments on selected white papers.

#### **General Comments**

- The papers are well written and informative as to the scale of emission reductions needed for attainment across all the emission sources. The documentation of current emission control programs is also very helpful.
- SANBAG supports a proactive approach to achieving air quality goals while also recognizing the importance of maintaining a vibrant economy that can attract and retain the businesses that will generate the capital needed for transition to cleaner fleets and fuels and more energy efficient buildings. San Bernardino County is at the leading edge of sustainability initiatives through our work on the HERO (Home Energy Renovation Opportunity) program, implementation of the San Bernardino Countywide Vision, and a range of other initiatives as highlighted in our Sustainability MOU with the Southern California Association of Governments (SCAG). See link to the MOU at the bottom of this web page: [http://www.sanbag.ca.gov/planning2/plan\\_county-wide-transit.html](http://www.sanbag.ca.gov/planning2/plan_county-wide-transit.html).
- The specific mechanisms (i.e. control measures) for achieving the requisite emission reductions should be identified as soon as possible to leave adequate time for public and business input, thought, and dialogue before completion of the draft AQMP.
- We would strongly urge additional regulatory approaches for mobile sources to be at the federal level, not at the state or regional level, so as to maintain a reasonably level playing field across the U.S. from an economic perspective. We recognize and appreciate SCAQMD's efforts to work with EPA to make this

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*Cities of: Adelanto, Barstow, Big Bear Lake, Chino, Chino Hills, Colton, Fontana, Grand Terrace, Hesperia, Highland, Loma Linda, Montclair  
Needles, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Twentymine Palms, Upland, Victorville, Yucaipa  
Towns of: Apple Valley, Yucca Valley County of San Bernardino*

point. The South Coast has done more than any other region in the U.S. to improve air quality, and this needs to be recognized at the federal level. Attaining air quality standards must be a joint federal/state/regional/local partnership. California and the South Coast cannot accomplish this on our own.

- Improvement in fleet and fuels technology will eventually enable the requisite mobile source emission reductions to be achieved as cleaner vehicles and fuels are introduced and as fleet turnover naturally occurs. *What is at issue is the degree to which these advancements can be accelerated and the rate at which vehicle fleets can be turned over to meet the attainment deadlines (particularly the 8-hour ozone standard), and at what cost.* We would request that SCAQMD estimate, as part of AQMP development, the incremental cost (to both industry and government) of accelerating the natural process of fleet turnover. That increment of cost should represent a starting point for discussion of the scale of federal and state incentives that will be needed to achieve the turnover rates required for attainment while not disadvantaging southern California from an economic standpoint. The health benefits of attainment should also be estimated, while recognizing that any adverse economic impacts will also have adverse health impacts to the southern California citizens whose livelihood may be affected through these air quality initiatives. SANBAG strongly supports the goal of attaining air quality standards but also urges AQMD and CARB to make a realistic assessment of the costs involved in making the attainment deadlines. We recognize that AQMD will be examining “black box” control measures for the 2016 AQMP, and these may also play a role in the District’s attainment strategy.
- We support strategies for criteria pollutants that have co-benefits for GHG reduction, but this will not always be practical if we are to meet the more pressing deadline for attaining the 8-hour ozone standard by 2023. For example, natural gas will likely play an important role in attainment of federal standards for criteria pollutants, even though it may not be ideal from a carbon content standpoint (note that over half of our electric power is still derived from natural gas, even though the percent derived from renewable sources is increasing).
- Low prices for traditional fuels will make private individuals and businesses less likely to buy alternative fuel vehicles. Forcing fuel prices higher through cap-and-trade or other mechanisms in California may help to influence individuals and businesses to upgrade to lower emission vehicles, but it will further disadvantage southern California from a competitive standpoint. Currently, the average price of a gallon of gasoline in California is 79 cents higher than the national average and 70 cents higher than our neighbor to the east, Arizona. In the long run, increases in this differential will undermine the economic growth that will be needed to finance the transition to cleaner fleets and could result in diversion of supply chains around the South Coast. The differential in fuel prices should be monitored and there should be sensitivity to the fuel prices paid by Californians versus the rest of the U.S. Businesses need to have a reasonably level playing field to stay competitive, and substantially higher energy prices will make it more difficult for local governments to attract and retain businesses. The State should recognize that there is a limit on how far California can deviate from

the national norms to avoid further disadvantaging ourselves economically and competitively. This dynamic is challenging from an attainment perspective, but must be recognized as a reality as San Bernardino County and the State compete in the global economy. Despite our best efforts, attainment deadlines may not be achievable given that we are dependent on both commercialization rates of advanced technologies and on vehicle and fuel choices that individuals and businesses must make. As much as we all hope to make the attainment deadlines, the nature and timeline of vehicle/fuel choices individuals and businesses make are not under our direct control. Although black box control measures may allow the South Coast to demonstrate attainment for the 2016 AQMP, the air quality agencies (AQMD, CARB, and EPA) will need to make realistic assessments of the fleet/fuels trajectory we are on as we get closer to the attainment deadlines.

### **Comments on Individual White Papers**

#### **Passenger Transportation**

- The fourth bullet on page 22 states: “If all vehicles and equipment were turned over to meet the lowest emissions standards established in current exhaust emission standards, the passenger transportation sector would potentially achieve the 65 percent ‘equal share’ NOx emissions reduction needed to attain the federal ozone air quality standard in 2023. However, given the number of vehicles and equipment in this sector, the likelihood of complete turnover will be challenging.” We see this as a hopeful sign that more progress is forthcoming even without additional regulation, and that given enough time, the standard will be achieved. This gets back to our earlier point of quantifying the incremental cost of accelerating emission reductions. There is a point at which accelerating fleet turnover at the rate needed for attainment may not be feasible or may not be worth the incremental costs.

#### **Goods Movement**

- We concur with the statement in the first bullet on page 25: “The most effective set of strategies will consist of a combination of accelerated advanced technology deployment, incentives programs to accelerate replacement of older trucks and off-road equipment, infrastructure enhancements, and funding incentives.” The State should particularly consider a substantial infusion of cap-and-trade funding early on to support fleet turnover rates that will accelerate attainment of ozone standards. Even with substantial technological advances and incentives, the trajectory of turnover rates will need to be regularly monitored and assessed regarding the feasibility and cost (both public and private sector) of our path to attainment.
- As described in the goods movement white paper, efficiency measures such as those described on page 25 are typically a win-win approach, even for relatively small emission reductions, and should be aggressively pursued.

#### **A Business Case for Clean Air Strategies**

- There are many common sense ideas in this white paper, based on lessons learned from industry. SANBAG appreciates this outreach and we trust that control measures will take these lessons learned into account, prioritizing measures where a business case can be made, as stated in the white paper. Where pure business cases cannot be made, these can be a focus of incentive programs, and we would hope that substantial incentives come from the federal level, not just our own state resources.

#### **Residential and Commercial Energy**

##### *General*

- Reference is made to Incentive/Rebate Programs but more has to be done to make these programs more easily and readily available to the public. If you use the [www.dsireusa.org](http://www.dsireusa.org) website to look for available incentives or rebates, one will find between 50 and 60 separate programs available. While it is good to have the support for clean energy and energy efficiency, the current system is much too complex and therefore underutilized. (pg. 10)
- We fully support the reference and support of distributed generation as a model to expand generation capacity from solar energy (pg. 13)
- We agree with the premise that emission reduction potentials from energy saving programs should be identified (pg. 16)
- We agree that a major barrier is adoption of energy saving measures by building owners who rent or lease commercial and residential space. Efforts must be made to find ways to incentivize these building owners to implement energy saving improvements. (pg. 17)

##### *Electricity*

- A section supporting adoption of Community Choice Aggregation models in communities in the District could recognize the potential to increase adoption and development of renewable energy. Los Angeles County and South Bay Cities are actively exploring CCAs.

We offer the above comments for consideration as the draft 2016 AQMP is developed over the next several months. We look forward to successful completion of the AQMP in a way that will move the region ahead with both cleaner air and a stronger economy.

Sincerely,



Steve Smith  
Director of Planning



## San Bernardino Associated Governments

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- ▣ San Bernardino County Transportation Commission    ▣ San Bernardino County Transportation Authority
  - ▣ San Bernardino County Congestion Management Agency    ▣ Service Authority for Freeway Emergencies
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February 29, 2016

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

RE: SANBAG letter on SB 743 CEQA Guidelines and Technical Advisory

Dear Mr. Calfee:

San Bernardino Associated Governments (SANBAG) appreciates this opportunity to offer comments on the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*. SANBAG is the Council of Governments and County Transportation Commission for the County of San Bernardino, the largest county geographically in the continental United States (over 20,000 square miles) and home to 2.1 million residents.

SANBAG actively collaborates with the Southern California Association of Governments (SCAG), our 25 member local jurisdictions, and the other counties in the SCAG region on planning activities of regional significance. We are keenly interested in the Revised Proposal, given the importance of delivering on transportation commitments we have made to our citizens as well as our substantial sustainability initiatives, examples of which are reflected in our Sustainability Memorandum of Understanding with SCAG, accessible at the bottom of the following SANBAG web page:  
[http://www.sanbag.ca.gov/planning2/plan\\_county-wide-transit.html](http://www.sanbag.ca.gov/planning2/plan_county-wide-transit.html).

We manage a robust multi-modal transportation program in San Bernardino County that supports the objectives of the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We are investing heavily in rail and premium bus transit systems, with over \$600 million in capital expenditures programmed between 2012 and 2025. We have worked with our local jurisdictions on promoting transit oriented development (TOD) at rail stations along the Metrolink San Bernardino Line, the most heavily traveled line on the Metrolink system, as well as on our future Redlands Passenger Rail line, which will be operational in 2020. We manage ridesharing and vanpooling programs and have an extensive Active Transportation Program as well. We understand what is required to make these systems work, from both a capital project and operations perspective. Our comments are founded in this background of field implementation experience and history of ridership, not merely theory.

CC160229 - SS

## Overview

SANBAG concurs with the primary intent of the legislation to make TOD easier to permit in transit station areas. This is a very important objective, and exempting infill projects in these station areas from the need to mitigate level of service (LOS) removes one of the barriers that can get in the way of accomplishing this. Jurisdictions along our growing rail/transit network in San Bernardino County will directly benefit from this streamlined approach.

SANBAG also appreciates modifications made to the guidelines in response to comments on the first version of the proposal. OPR has conducted extensive outreach on the draft guidelines, and this has been essential given the scope and complexity of potential changes to CEQA procedures. Specifically, we appreciate the inclusion of the following:

- **The two-year phase-in period.** The proposed CEQA guidelines, though short in terms of the number of words, will be complex in their application, and it is important for the procedures to be more settled prior to full implementation. We believe a longer grace period would be even better to enable the convergence of methodologies, but the two years is appreciated. We expect that the Technical Advisory will need some revisions in response to the lessons learned during the phase-in period, and we would request that OPR make a commitment to revisiting the Technical Advisory starting at about the 18-month point after adoption, with recirculation for comments.
- **Acceptance of variations in significance thresholds by geographic area.** The regional average originally proposed was too inflexible to accommodate the wide range of circumstances that will be encountered, especially in the SCAG region.
- **Recognition in Section 15064.3(b)(2) of the guidelines that programmatic approaches may be appropriate.** As stated, *“To the extent that the potential for induced travel has already been adequately analyzed at a programmatic level, a lead agency may incorporate that analysis by reference.”* This is a much more effective way to analyze potential VMT-related impacts and the achievement of the State’s objectives than a project-by-project approach. Some projects may increase VMT yet be critically important for accessibility and mobility reasons, especially in freight corridors. Taken together with other regional strategies outlined in the SCAG RTP/SCS and elsewhere, we would expect the impacts of growth to be mitigated at the regional level. Holding every individual project to a VMT standard is not an efficient means of project delivery, nor will it best achieve the broad set of objectives outlined in both State and regional plans and programs.

### Specific Comments

1. **Highway projects** - We believe that the suggested thresholds and methodologies being proposed by OPR would make most highway widening projects extremely difficult to mitigate individually. This would lead to the preparation of many additional EIRs, requiring numerous CEQA statements of overriding considerations, including overrides by Caltrans for projects on State highways. Just in San Bernardino County, there are a number of projects critical to freight corridors on I-10, I-15, SR-210, and U.S. 395. These are important not just for freight mobility, but for public safety as well. U.S. 395 in the Victor Valley, for example, has one of the higher accident frequencies on the State system and is planned for widening to four lanes, over time. Putting these projects in the position of requiring CEQA overrides by Caltrans will increase the uncertainty about whether these projects can be built, and will be counter-productive to achieving the objectives outlined in the California Freight Mobility Plan and regional plans. Delays to these projects will also be costly, at a time when transportation revenue has already dropped significantly.
2. **Example of the mitigation challenges** - One illustration of the challenges for highway projects can be taken from OPR's example in the Technical Advisory of the 2.2-mile road widening project in Kern County. Suggested mitigation measures include: *"administer a toll on the new and/or existing lane miles sufficient to reduce VMT to below-threshold levels, or manage new and/or existing lane miles (e.g. with an HOV requirement) to similarly reduce VMT. Alternately or in conjunction, travel demand management measures such as providing transit or active transportation service or facilities, providing park and ride facilities, or providing a vanpool program could be employed to similarly reduce VMT."* Although OPR suggests that these are only example mitigation measures, it is difficult to see how these and other measures in the CAPCOA list would be practical for an individual widening project such as this. No agency will randomly implement tolling on an isolated stretch of roadway as part of a mitigation measure. This is why, as stated before, it will be much better to address these impacts programmatically, not at a project-by-project level. If one takes that example a step further and analyzes what it would take to mitigate the VMT increase on the Kern project down to a less-than-significant level, it turns out that the reduction would need to be almost the level of VMT reduction of Metro's Expo Rail Line Phase 2 project. Clearly, OPR and transportation agencies throughout the State need to think this through further and determine how to generate reasonable thresholds and ways to make mitigation more feasible. At a minimum, assignment of a VMT baseline needs to be calculated differently than recommended in the OPR Technical Advisory. Allocating a statewide total equally across a specific number of projects (see page IV:54) is not an analytically sound approach. It also appears that establishment of the statewide total of VMT needed to achieve GHG reduction goals is not defensible, given that the VMT impact of most highway projects cannot likely be mitigated. It may

be more cost-effective (and faster) to achieve those reductions through technology-based strategies. Our preference would be to eliminate the project-by-project induced growth methodology for highways altogether, in favor of a programmatic approach, but OPR appears to be of the view that it is important to retain it, even though SB 743 does not require it.

3. **Other implications of infeasible mitigation** - Creating a process for which mitigation is generally infeasible suggests that VMT-based strategies will be only marginally effective for achieving the broader goals of the State regarding energy savings, GHG reduction, and air quality. In fact, the analysis in the draft California Transportation Plan 2040 clearly demonstrated that GHG reduction goals for mobile sources would need to be achieved largely through advances in fleet and fuel technology and acceleration of the rate of turnover of vehicles in the statewide vehicle population. SANBAG agrees. Although VMT reduction is a worthy goal, practically speaking, it is an ineffective way to attain GHG reduction, energy, and air quality goals. Too much focus on VMT will divert us from where attention needs to be placed: technology, fuel economy, fleet turnover, and building efficiency.
4. **Exempting freight corridors** - Strategic highway improvements supporting freight mobility are important for the competitiveness of the California economy as well as for local commerce. To that end, we would also request that the freight corridors documented in the California Freight Mobility Plan (CFMP) be exempted from the requirement for the analysis of induced growth. This would be consistent with the Governor's Executive Order B-32-15, which highlights competitiveness as one of the pillars of sustainable freight and a sustainable economy going forward.
5. **Land use projects** – As stated earlier, SANBAG is completely supportive of the primary purpose of SB 743 to make infill TOD development easier to permit in transit station areas by eliminating LOS as an impact. We also agree that it is desirable to reduce VMT wherever possible. Like highways, however, thresholds of reduction for land development need to be tailored to the context, and impacts need to be feasible to mitigate.

For development projects, the OPR Technical Advisory (page III:20) states: "... OPR finds, absent any more project-specific information to the contrary, that per capita or per employee VMT fifteen percent below that of existing development may be a reasonable threshold, for the reasons described below. (Note: Lead agencies may apply more stringent thresholds at their discretion.)" OPR presents several reasons for selecting the 15 percent reduction in VMT/capita as the threshold of significance. For example, the Technical Advisory states that the *Caltrans Strategic Management Plan* calls for a 15 percent reduction in per capita VMT, compared to 2010 levels, by 2020. It is also suggested that these levels of mitigation are feasible, by reference to the CAPCOA document

***“Quantifying Greenhouse Gas Measures.”*** We have read over the material relating to the 15 percent reduction target and have also studied the CAPCOA reference cited in the guidelines. While the document is an excellent resource of technical data on potential VMT reductions, the feasibility of mitigation will greatly depend on the context. Transit may or may not be available or financially feasible based on the transit agency’s financial resources and Federal Transit Agency (FTA) fare box recovery criteria. Extensive ridesharing and vanpooling programs already exist in most parts of Southern California, so it would be difficult to determine how a development would do more than is already being done. Higher densities are desirable, but projects may not pencil out financially at higher density levels, even within transit station areas. Local agencies cannot force developers to build what they cannot afford.

This is not to say that we should not try. AB 32, the Global Warming Solutions Act, refers to measures that are technologically feasible and cost-effective. That is a basic benchmark that can be applied to mitigation measures for development projects. Community builders can do a lot about GHG reduction through energy efficiency and design. They have less control over VMT, and OPR should not put environmentally sound projects in a position of having to mitigate VMT at a level that is not feasible. To use a very hypothetical example, let’s say in the future a development project is proposed in a traditional suburban setting in a way that will be technologically transformational (such as one where, for the sake of the example, 50% or more of the vehicles are required to be electric), but the project is unable to mitigate its VMT impact. Most people would question why VMT should be an issue in this case. In addition, an unintended consequence of making residential projects more difficult to permit (by virtue of VMT requirements) will only exacerbate an already challenging housing affordability environment. The point of this discussion is that the VMT reduction targets need to be realistic for the context, and it will take some time for the planning practice to settle into what is reasonable. We should not prematurely set targets for VMT reduction for land use.

- 6. What is a reasonable reduction in VMT/capita?** - While we appreciate the excellent compilation of technical data in the CAPCOA document, we would like to illustrate how VMT/capita plays out in a regional context. One way to get a better handle on the feasibility of VMT reduction is to examine differentials in VMT/capita among regions, comparing regions that have high per capita VMT versus regions that have lower per capita VMT. To do this, we accessed per capita VMT by federally designated urbanized area from the USDOT website at: <https://www.transportation.gov/mission/health/vmt-capita>.

Table 1 shows VMT/capita by urbanized area for several urbanized areas (UZAs) in southern California, and compares those to other urbanized areas within California and elsewhere in the U.S. It should be noted that there could be a

variety of explanations for why VMT/capita varies from place to place, including urban form, demographics, economics, and extent of inter-regional traffic.

**Table 1. VMT/Capita for Urbanized Areas**

Source: US Dept. of Transportation  
<https://www.transportation.gov/mission/health/vmt-capita>

<u>Areas in South Coast Air District</u>	VMT/Capita
Indio/Cathedral City	20.4
LA/Long Beach/Anaheim	22.3
Riverside/San Bernardino	23.1
<u>Other Areas in CA</u>	
Bakersfield	15.5
Concord	23.6
Fresno	18.6
Lancaster/Palmdale	16.8
Sacramento	20.3
Santa Barbara	20.4
San Jose	21.4
San Diego	22.3
SFO/Oakland	20.4
Simi Valley	20.4
<u>Other Comparison Areas</u>	
Boston, MA-NH-RI	22.4
DC/Maryland/Virginia	21.3
Denver/Aurora, CO	20.8
New York Metro Area	15.6
Phoenix, AZ	21.4
Portland, OR	18.8
Seattle, WA	23.1

For example, one would expect that the lower VMT/capita in the Central Valley may have to do with economics. The lower VMT/capita in the New York Metro Area is clearly due to the very high densities and extensive transit network. The lower VMT/capita in the Indio/Cathedral City area could be due to a combination of high retirement population and economically disadvantaged communities in the east part of the valley. Even some of the California metro areas thought to have higher densities and perhaps better transit systems than the LA Metro area are very similar in VMT/capita. All of these differentials suggest that there are many factors that will be in play to make the setting of a VMT reduction target very difficult. Individual projects should not be penalized

because of the characteristics of the geographic area, demographics, or economics of the area in which the project is set. Here some instructive comparisons:

- Riverside/San Bernardino at 23.1 has a 3.6 percent higher VMT/capita than the LA/Long Beach/Anaheim UZA. Riverside/San Bernardino would require a massive land use restructuring and billions of dollars in transit investment for only a few percent reduction in VMT/capita
- The LA/Long Beach/Anaheim UZA at 22.3 would require a significant restructuring to attain the 20.4 VMT/capita of the SFO/Oakland UZA. (to achieve a 9 percent reduction in VMT/capita.)
- Comparisons of the LA/Long Beach/Anaheim UZA to other areas include:
  - Sacramento – LA/Long Beach/Anaheim (LA/LB/A) is 9.9% higher
  - San Jose – LA/LB/A is 4.4% higher
  - San Diego – Equivalent
  - Boston – LA/LB/A is 0.4% lower
  - DC/MD/VA area – LA/LB/A is 4.7% higher
  - Denver – LA/LB/A is 7.2% higher
  - New York Metro – LA/LB/A is 43% higher
  - Phoenix – LA/LB/A is 4.2% higher
  - Portland – LA/LB/A is 19% higher
  - Seattle – LA/LB/A is 3.5% lower

Given the above, one would have to question the attainability of the goal of 15 percent reduction in VMT/capita stated in the *Caltrans Strategic Management Plan*. Aside from the New York Metro Area, only Portland has a VMT/capita that is more than 15 percent lower than the LA/LB/A urbanized area, and Portland has had some of the most strict land use regulation in the U.S., implemented over many years. Change in VMT occurs at a snail's pace relative to changes in technology, and the economy likely is the greatest influence on VMT/capita, at least in the short term.

This highlights the importance of using this two-year phase-in period for testing, and we believe OPR should consider being less definitive on suggesting thresholds at this stage until we have more technical information. Although the CAPCOA document is a very good resource of technical data, it does not deal with the complexities we face in the analysis of projects in the field. Analysis of travel behavior and VMT is much more complex than one might infer from the OPR Technical Advisory. We believe it is premature to be this definitive on VMT reduction targets, given the learning curve that both the private and public sectors will be engaged in during the grace period.

In addition, we suggest that OPR establish a clearinghouse for technical information on VMT impacts and mitigation, compiling experience and lessons learned even prior to the adoption of the guidelines. As OPR is aware, trip generation rates for individual land use

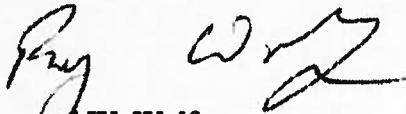
Christopher Calfee  
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types vary widely based on many different factors, even for very tightly defined use types. There is a long history of experience with variability in this data for traffic impact studies. Incorporating trip length, mode choice, auto occupancy, and other factors will make VMT analysis even more complex than LOS, in many ways.

Time is of the essence to determine if and how the State can converge on the technical methodologies and data that will result in a stable set of processes and assumptions that can be used to implement SB 743. As we stated earlier, we are concerned that two years is not enough time. The State should provide funding so that this compilation of methodologies and data can be well organized and objectively managed. We would also suggest that an independent peer review be scheduled prior to the 18-month point in the 2-year phase-in schedule, as referenced earlier.

Again, we appreciate the opportunity to comment and the initiative OPR has taken to reach out to agencies throughout California. We look forward to a workable implementation of SB 743.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ray Wolfe', is written over the typed name.

Raymond W. Wolfe  
Executive Director



**Metro**



February 29, 2016

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**RE: Comments on the "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA" to Implement SB 743**

Dear Mr. Calfee:

The Southern California Association of Governments (SCAG) and the County Transportation Commissions (CTCs) undersigned would like to express our sincere appreciation for the extensive efforts put forth by the Office of Planning and Research (OPR) staff in developing this latest proposal in support of the draft CEQA Guidelines update, pursuant to SB 743. We thank you for the opportunity to provide comments.

As the Metropolitan Planning Organization representing 6 counties and 191 cities in Southern California, SCAG is responsible for implementing SB 375 in our region. In April 2012, SCAG's Regional Council adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, a transformational plan for Southern California. SCAG is now in the final stages of developing the 2016-2040 RTP/SCS, which is focused on further achieving regional sustainability objectives and reducing greenhouse gas emissions.

SCAG recognizes the importance of SB 743 for the effective implementation of SB 375. The development of an alternative metric to evaluate CEQA transportation impacts that serves to reduce greenhouse gas emissions, supports development of multimodal networks, and encourages mixed-use transit oriented development, will also serve to facilitate implementation of the 2016 RTP/SCS. SCAG recognizes that the proposed transition to a VMT based metric will facilitate implementation of many of the sustainability strategies outlined in the RTP/SCS and will support regional investments, particularly in active transportation and transit.

OPR's extensive outreach efforts, which most recently included a well-attended stakeholder meeting at the SCAG offices on February 18, 2016, have provided our local stakeholders the opportunity to gain a better understanding of the Revised Proposal and to offer timely

Mr. Christopher Calfee  
February 29, 2016

and meaningful input. We very much appreciate the exemplary diligence OPR has demonstrated throughout this process to maximize participation by our regional and local stakeholders in developing the revised CEQA Guidelines through the several meetings and workshops conducted by OPR in support of this effort over the past two years. We also commend the responsiveness of OPR staff in engaging our stakeholders in meaningful discussions.

## **OVERALL CONCERNS**

Despite OPR staff's efforts, SCAG still has serious concerns if the current version of the Revised Proposal document is adopted. It is important to note that the ability of our RTP/SCS to meet both state and federal statutory requirements is dependent upon implementation of the Plan as a whole, including the addition of highway and roadway capacity to meet the existing and projected future transportation mobility needs of millions of residents living and working in our region.

The 2016 RTP/SCS presents a balanced and integrated land use and transportation plan for the Southern California region that respects local input from our member cities and counties, and is consistent with respecting local control over land use issues as required by state laws, including SB 375. SB 743 and its implementation through the CEQA Guidelines will greatly facilitate the region's ability to plan for and implement transit supportive development patterns and encourage built environment conditions that support increased active and public transportation. However, the highway capacity improvement projects included in the 2016 RTP/SCS are also an integral component of the Plan, and any VMT impact that individual projects may produce, either direct or induced, is balanced at the regional level by a wide array of other projects and strategies that serve to reduce VMT and meet regional GHG reduction targets. Therefore, it is imperative that OPR's proposal be modified to assure that individual capacity improvement transportation projects that are identified in the RTP/SCS, sales tax measures, or STIP be grandfathered and not be evaluated or required to comply with a new project-specific VMT metric in isolation of the integrated regional plan of which they are a part.

Implementation of the current version of the Revised Proposal, with the proposed new VMT and induced demand impact analysis requirement, creates new litigation risks for transportation projects that have already been included in the approved 2012 RTP/SCS (and evaluated in the accompanying certified Programmatic Environmental Impact Report (PEIR)), and those that are included in the pending 2016 RTP/SCS and PEIR. Imposition of new project-level VMT and traffic inducement CEQA impact analyses jeopardizes the integrity of our transportation plan, and could create unwarranted new legal risks for voter-approved, federally-approved, and state-approved transportation capacity investment projects. For these reasons, we strongly urge OPR to limit the new Guidelines to approving the suggested VMT impact metric aimed at streamlining the CEQA process for infill projects by SB 743 to the Transit Priority Areas at the present time, or at minimum, extend the opt-in period for non-Transit Priority Areas and the grandfathered projects identified in the RTP/SCS, sales tax measures, or STIP.

## **ADDITIONAL SPECIFIC COMMENTS**

Below are additional specific comments as related to the induced demand analysis, mitigation requirements for capacity improvements projects, fair share allocation, RTP/SCS consistency, and grace period.

### **Induced Demand Analysis**

- Induced demand is a major new CEQA impact concept, and the following is a partial list of issues that should be comprehensively addressed in a workshop setting prior to issuing this revision to the CEQA Guidelines. We would like to invite OPR staff to lead the workshop, and we appreciate our continued collaboration with OPR toward achieving successful implementation of the revised Guidelines.
  - Requiring induced demand and related VMT analysis for individual projects will increase the risk of litigation due to the general infeasibility of providing the required mitigation measures in many areas, thereby mandating the preparation of a large number of separate EIRs for a multitude of individual projects.
    - Recalibrate the fair share of VMT threshold so that the fair share is apportioned to capacity only projects.
    - Develop models that adequately assess the regional effects of VMT.
  - OPR should provide clarification regarding what specifically constitutes induced demand with respect to VMT. The addition of a definitions section in the Technical Appendix may allow the opportunity to provide more precise descriptions of some of the terms used in the document.
  - Freight corridors documented in the California Freight Mobility Plan should be exempted from the induced growth analysis requirement. This is consistent with Executive Order B-32-15, which highlights competitiveness as one of the pillars of sustainable freight and a sustainable economy. In addition, special consideration should be given to projects that promote dedicated freight corridors or zero/near-zero vehicle technology.
  - More direction is needed regarding how to determine the CEQA baseline for induced impact analysis.
  - Clarification is needed on the approach to be used for analyzing induced demand by project type.
  - Providing the option for use of a programmatic approach to project-level induced growth evaluation, including the use of tiering from previously adopted EIRs, such as the 2012 or the pending 2016 RTP/SCS PEIR, would relieve local jurisdictions of the significant and costly burden of having to perform separate analyses for each individual transportation project.
  - Grandfather in projects in the 2016 RTP/SCS, sales tax measures, or in the STIP.

### **Mitigation Requirements for Capacity Improvement Projects**

- Many of the mitigation measures suggested in the Technical Advisory are clearly in line with regional and local priorities including active transportation, first/last mile connectivity, transit supportive development patterns, transit expansion, and

complete streets. We particularly appreciate the suggestion of a fee-based mitigation option, though we would welcome more guidance on the suggestion. Nevertheless, many of the recommended VMT mitigation measures included in the Technical Advisory are not feasible options in some areas, particularly suburban, rural, and other non-transit amenable locations. In addition, capacity improvement projects that are not of a scale large enough to impact regional VMT performance should be considered for exemption from this requirement.

- The Draft Guidelines should clearly state that only capacity increasing transportation projects would require mitigation.
- Additional guidance regarding the presentation of feasible mitigation options for projects in suburban and other outlying non-TPA areas is recommended. Many of the options presented in the Technical Advisory are not feasible for highway improvement projects.

### **Fair Share Allocation**

- The 'fair share' VMT allocation methodology presented in the Technical Advisory could prove to be more beneficial as a tool for estimating the VMT threshold of a capacity increasing project by revising the allocation calculation to make it more responsive to the multitude of factors that affect a project's VMT impact.
  - Clarification is needed regarding the appropriate methodology for calculating 'fair share' VMT at the project-level.
  - The 'fair share' allocation methodology should be revised to take into account the scale of a project including, for example, lane miles, costs, and facility type.
  - The 'fair share' allocation methodology should be applicable only to projects that increase highway capacity.
  - The 'fair share' methodology should be crafted not to penalize fast growing areas or roadway projects that provide much needed connectivity and accessibility.
  - However, the data and assumptions required to determine the statewide VMT cap and allocation are fluid, which would result in the need to constantly monitor and adjust the fair share allocations. The development of a programmatic approach to VMT allocation may reduce the uncertainties introduced by the currently recommended project-oriented 'fair share' methodology.

### **RTP/SCS Consistency**

- The land use assumptions and data being used in support of the 2016 RTP/SCS for the SCAG region are to be adopted at the jurisdictional level. Any interpretation of RTP/SCS data at a geographic scale smaller than the jurisdictional level should not be used for purposes of determining consistency with the RTP/SCS.
  - Language is needed in the revised Guidelines that clearly states that RTP/SCS consistency is to be determined at the discretion of the lead agency and is to be based on the aggregation of TAZ data to the jurisdictional level.
  - Cities and counties control local land use decisions under the California constitution and other statutes, such as General Plan laws. SB 375, which creates the statutory framework for reducing GHG from the land use and transportation sectors, specifically calls out and respects local control over land

use decisions. Successful collaborative planning efforts have allowed our region to meet and exceed GHG reduction targets. As a result, we strongly urge the guidelines allow for flexibility among the local region to address and resolve issues as best fits the local context.

### **Grace Period Extension**

- It is beneficial that OPR has included a 2-year opt-in period to allow less prepared jurisdictions the opportunity to gradually develop the resources needed for successful implementation of the revised Guidelines.

To further promote successful implementation in non-TPA areas, an extension of the process to allow for technical and policy workshops, and refinements of the proposal, is required in addition to an eventual proposed grace period to allow more time to absorb lessons learned from the initial implementation is recommended. It is imperative that local jurisdictions have adequate tools and resources in place to implement any new analytical requirements established by the revised Guidelines before Guideline revisions are adopted or implemented.

For example, the VMT averaging approach suggested for unincorporated areas and incorporated cities for various types of land uses requires the availability of VMT data for these sub-areas of a region, and further requires the creation of average VMT for existing land use categories within a region. These VMT methodologies should be developed, and tested, before any Guideline revisions are proposed or adopted.

- OPR should consider granting an extension of the 2 year 'opt-in' period to allow suburban localities and other non-TPA areas adequate time to resolve issues regarding the limited availability of feasible mitigation options in these areas.
- Reconvening stakeholders approximately 18 months after initial implementation of the revised Guidelines in the TPAs is recommended so that OPR will be able to report on lessons learned to stakeholders, and to establish a strong foundation of implementation experience which can be used to evaluate how best to proceed to further improve implementation.
- We strongly encourage OPR to grandfather capacity projects that are approved and/or identified in the 2016 RTP/SCS, sales tax measures, and the STIP, and that OPR focus the CEQA streamlining measures in support of SB 743 in the Transit Priority Areas at the present time, which will help promote transit-oriented infill development in those locations while also providing a strong foundation for achievement of both the regional transportation sustainability goals of the 2016 RTP/SCS and the statewide GHG reduction goals of SB 375. At a minimum, the opt-in period should be extended for implementation in non-Transit Priority Areas.

In summary, it is our contention that the most efficient means for preventing sprawl, and the concomitant greenhouse gas emissions it produces, is to incentivize compact development, and focusing implementation of the revised CEQA Guidelines to the Transit Priority Areas, at least until such a time that a more complete understanding of the implications that may be presented by a more expansive implementation of the revised Guidelines is obtained. We support our region's and our state's mutual goal of sustainable development and

Mr. Christopher Calfee  
February 29, 2016

greenhouse gas reduction, but feel strongly that to succeed we must have the ability to implement the projects that were authorized in the regional transportation plans and sales tax measures. In order to deliver on the commitments made in these plans, it is critical that the opt-in period be extended for non-Transit Priority Areas and that capacity projects identified in these plans be grandfathered.

SCAG and the CTCs undersigned look forward to continuing to assist OPR in the development of the CEQA Guidelines Update pursuant to SB 743 to ensure that the revision does not place undue burdens to our member jurisdictions and delays in project implementation. Please keep us apprised of the status of this initiative, and let us know of any means by which we may be able to further assist OPR staff to ensure the successful implementation of the revised CEQA Guidelines in the SCAG region.

If you have any question, please contact Ms. Huasha Liu, Director, Land Use and Environmental Planning, at (213) 236-1838.

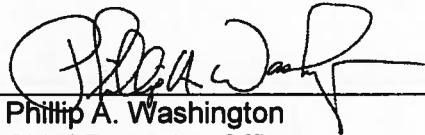
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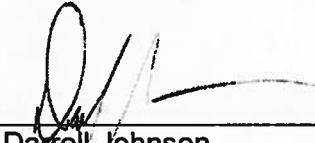
Hasan Ikhata  
Executive Director  
Southern California Association of  
Governments



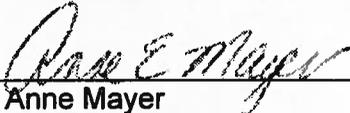
Mark Baza  
Executive Director  
Imperial County Transportation  
Commission



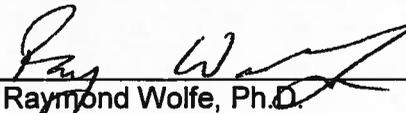
Phillip A. Washington  
Chief Executive Officer  
Los Angeles County Metropolitan  
Transportation Authority



Darrell Johnson  
Chief Executive Officer  
Orange County Transportation Authority



Anne Mayer  
Executive Director  
Riverside County Transportation  
Commission



Raymond Wolfe, Ph.D.  
Executive Director  
San Bernardino Associated Governments



Darren Kettle  
Executive Director  
Ventura County Transportation  
Commission

**June 25, 2015**

**Mr. Jim Madaffer, Chairman  
California Road Charge Technical Advisory Committee  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 94273**

**Subject: SANBAG comments on the California Road Charge Pilot Program**

San Bernardino Associated Governments (SANBAG) appreciates this opportunity to offer comments to the Road Charge Technical Advisory Committee on the Road Charge Pilot Program required by SB 1077. SANBAG is the Council of Governments and County Transportation Commission for the County of San Bernardino, the largest county geographically in the continental United States (over 20,000 square miles) and home to 2.1 million residents.

We recognize the importance of the pilot program in providing direction for a substantial portion of our future transportation funding. We offer several comments at this time and would expect to be providing additional input as the design of the pilot program continues.

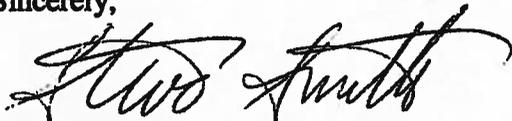
- SANBAG is supportive of a robust pilot, testing a full range of possible technology options from simple to advanced technology and covering a range of vehicle types, area types, and traveler/fleet characteristics that could be accommodated in a permanent program. We concur that a mix of rural and urban drivers is important to include in the pilot. In addition, we believe that the inland areas of Southern California need to be adequately represented in the pool of pilot drivers, given the wide range of commute distances and times that we particularly experience in this "suburban fringe" area of the region. This should include a cross-section of vehicle types, from conventional to alternate fuel vehicles (AFVs). We are willing to assist in recruitment, where possible, if that would help to ensure that our population of drivers is adequately represented.
- If trucks are included in the pilot (and indications are that they will be), we would suggest that the pilot include both fleets and owner-operators, so that the dynamics of interaction with this range of commercial vehicles can be captured. An ultimate system must be able to deal with fleet charging/billing as well as owner-operator charging/billing. Again, this is particularly important for the Inland Empire, given the large presence of logistics businesses in our area.

Out-of-state trucks need to be included as well as trucks that operate only within the state. Service vehicle fleets should be included that have a mix of conventional and alternate fuel vehicles.

- We are assuming that public transit fleets will be exempted, as they currently are exempted with the gas tax, so there would be no need for inclusion of transit fleets in the pilot test.
- Thinking ahead to the structure of an ultimate road charge program, and given the many potential complexities, it may be advisable to take an incremental approach, staged over a period of years, with intermediate checkpoints and evaluation periods. An output from the pilot, or subsequent discussions, should include options for implementation ranging from incremental, stepwise growth to a more aggressive program. In other words, it would be helpful if any recommendations on implementation included in the report from the road charge pilot (or subsequent discussions by CalSTA and/or the TAC) could delineate a range of approaches, not just one possible approach. The TAC and/or CalSTA should solicit input from agencies, the private sector, and the public on the merits of several alternative courses of action. An example of an incremental step would be to initially focus on Alternative Fuel Vehicles, as suggested by Metro at the May 29 meeting of the Road Charge TAC, including ways of dealing with hybrids. It would be helpful if the pilot test report could identify the potential costs, implementation challenges, and risks associated with the range of implementation options.
- We want the pilot to succeed in informing policy makers, agencies, and the public on how an ultimate implementation can also succeed. The transportation industry needs adequate and stable sources of revenue to continue building, maintaining, and operating the infrastructure that California requires to serve the public and to remain competitive in the global and national economies. The potential impact is too great and the stakes are too high to perform a pilot that is less thorough than it should be. We understand the desire to speed up the conduct of the pilot, but it should not be at the expense of taking shortcuts or skipping steps that are important to designing an ultimate program that has a high probability of success. Speeding up the program increases the chances of missteps, which could set the program back, not advance it. This is potentially a very complex program, and it is more important to do it right than to do it fast.

Again, we appreciate the diligent work being conducted by the Road Charge TAC and look forward to additional information and opportunities to comment.

Sincerely,



Steve Smith  
Director of Planning



San Bernardino Associated Governments  
909.884.8276 ♦ www.sanbag.ca.gov



October 30, 2015

Mr. Ken Alex, Chair  
California Strategic Growth Council  
1400 10<sup>th</sup> Street  
Sacramento, CA 95814

Subject: Draft Affordable Housing and Sustainable Communities (AHSC) Guidelines: TOD, residential densities, and transit headways in San Bernardino County.

Dear Mr. Alex:

This letter expands on the AHSC “lessons learned” comment letters dated July 31, 2015 from the County of San Bernardino and the San Bernardino Associated Governments (SANBAG). Our letter requests modifications to the AHSC guidelines to make it more feasible for San Bernardino County jurisdictions to participate in the AHSC program. The two keys to enable this to occur involve a relaxation of the headway requirement specifically for rail transit and providing more flexibility in residential density criteria, such as by changing the way in which “suburban” is defined. The next sections provide background behind these requests and specific suggestions for change.

### **1. High Quality Transit Areas (HQTAs) and Transit Oriented Development (TOD)**

From a regional perspective, transit and TOD are most successful when the transit network is extensive and the transit stations are easy to access at both ends of the trip. Southern California has grown from almost no passenger rail in 1990 to over 500 miles of commuter rail and nearly 100 miles of heavy rail and light rail today. This is transforming travel and land use in Southern California. San Bernardino County is part of this growing network, and SANBAG is making substantial investment to expand it. Unfortunately, this investment is not recognized in the current AHSC guidelines.

The Valley subarea of San Bernardino County has one of the most extensive high-capacity transit networks of any of the suburban counties, yet the draft AHSC guidelines only partially recognize these investments under the TOD Project Area category. For example, the most heavily used commuter rail line in southern California, the San Bernardino Metrolink Line, has nine trains from San Bernardino to Los Angeles between 4:00 and 8:00 AM to handle the inbound peak passenger loads, averaging 30 minute headways, yet the passenger volumes are far in excess of most bus lines with 15-minute headways.

SANBAG and the local jurisdictions have a comprehensive strategy for TOD in this corridor, referenced as the “ARRIVE Corridor” (ARRIVE = Advanced Regional Rail Integrated Vision – East: see [http://www.sanbag.ca.gov/planning2/study\\_arrive.html](http://www.sanbag.ca.gov/planning2/study_arrive.html) for additional information). There are six stations along this line, soon to be seven (Montclair, Upland, Rancho Cucamonga, Fontana, Rialto, San Bernardino Depot area, and downtown San Bernardino, site of a new transit center). These station areas are ideal locations for transit-supportive, higher-density housing (including affordable housing projects) that will form a growing nucleus of station-area development.

As stated in SANBAG’s July 31, 2015 letter, we urge the guidelines for the AHSC grants to provide more flexibility for rail stations to qualify as TOD Project Areas. Headways of 30 minutes for rail stations, rather than 15 minutes, would enable the San Bernardino Metrolink line to qualify. Local jurisdictions are committed to development around these rail stations, and this will continue to expand the transit network connecting regional origins and destinations as referenced earlier.

San Bernardino County also initiated service in 2014 on a 16-mile Bus Rapid Transit (BRT) line running from California State University San Bernardino through downtown San Bernardino to Loma Linda Hospital/University and the Veterans Administration Hospital in Loma Linda. This line already qualifies for the TOD Project Area category. Additionally, SANBAG is investing over \$250 million in the 9-mile Redlands Passenger Rail line between downtown San Bernardino and the University of Redlands. Cities along this corridor are also committed to TOD development, and the guidelines should recognize rail projects that are in design and construction as opportunities for TOD development that may be completed within the same timeframe as the rail system.

Omnitrans (the transit operator for bus services in the San Bernardino Valley) also has a second major BRT project in development linking Fontana, Rancho Cucamonga, Ontario, Montclair, and Pomona. This line will provide 10/15-minute peak period headways, and should also be considered as an opportunity to take advantage of the AHSC TOD Project Area funding in the near future. The State’s commitment to flexibility in defining TOD Project Areas will assist suburban areas (but urbanizing) like the San Bernardino Valley with expanding the Southern California transit network, enabling TOD development in the suburbs as well as in the urban core. This will go a long way toward helping these urbanizing areas with significant emerging transit networks to reduce their GHGs.

## **2. Housing Densities and Definition of Suburban**

Figure C-1 of the guidelines defines suburban as: “Jurisdictions (cities/counties) located within a Metropolitan Statistical Area (MSA) with a population of less than 2 million unless a city has a population of greater than 100,000 in which case it would be considered Urban.” The definition

is used to establish density thresholds to qualify projects for TOD. Residential AHSC projects must be a minimum of 20 units per acre in an area defined suburban and 30 units per acre in the urban category.

San Bernardino County is in the Riverside/San Bernardino MSA, which has a population in excess of 4 million. Yet by almost any other definition, the vast majority of the MSA would be considered suburban. Further, land values do not generally support residential densities of 30 units per acre in San Bernardino County. They may support those densities at some point in the future, but they do not support them now without inclusion of a substantial portion of efficiency units, which are not generally marketable in areas where we are focusing TOD development.

To provide San Bernardino County more of an opportunity to participate in the AHSC program, we propose that suburban be defined at the city level on the basis of existing population densities. This is really the statistic that sets urban apart from suburban, and densities tend to correlate with land values, which in turn determine the project densities that tend to be financially viable. For example, many of the cities in Los Angeles County have population densities in excess of 10,000 persons per square mile. Almost all the cities in San Bernardino County have densities less than 5,000. See the following link to U.S. census data containing county-level and city-level population densities:

[http://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml#none](http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#none).

It would seem inappropriate to lump all of these areas together just because San Bernardino County happens to be in a large MSA. The distinction between urban and suburban currently in the guidelines (MSA size and city population) has little relationship to the objectives that the AHSC program is trying to support: better integrating the transportation/land use relationship. Higher land values tend to accompany areas with higher densities, making this a much better indicator of the financial feasibility of AHSC projects across a range of housing densities.

Using city-level densities would also have the benefit of allowing suburban cities situated in large counties to be distinguished from urban areas of the county in terms of the AHSC density requirements. For example, north Los Angeles County (Palmdale and Lancaster) is very different from the urban settings of the Valley.

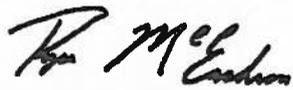
We would propose a working threshold of 7,500 persons per square mile to distinguish urban and suburban. Those cities equal to or higher than that threshold would qualify as urban for purposes of AHSC and those less than 7500 would qualify as suburban. Compared to the MSA criterion, this is a much more refined and appropriate yardstick by which to impose minimum residential density thresholds for AHSC projects.

If the SGC is willing to make this change, it will provide a much greater opportunity for a wide range of suburban jurisdictions, including San Bernardino County, to compete for TOD-related funding as we expand our transit network to accomplish the very objectives espoused by the SGC. Over time, our densities will increase, and there may be a time when certain cities would move into the urban category. The current criterion of MSA size and city population is simply not the most effective way to distinguish urban and suburban in a way that accounts for financial viability. San Bernardino and Riverside Counties happen to be in a large MSA within a large metropolitan area of 18 million people and are currently excluded from the TOD competition for that reason, despite our extensive investment in transit systems that are designed to facilitate TOD. TOD developments along these suburban “spokes” are critical to interact with the urban “hubs” for an effective, efficient regional transportation system.

One other request is to consider basing the housing density criterion on the number of persons per acre rather than the number of units per acre. To accomplish this, densities could be based on the number of bedrooms, correlated to number of occupants. This would avoid the current problem of having to include more senior/1-bedroom/efficiency units than would be appropriate or marketable for some of the potential TOD sites. Using a per-unit criterion penalizes family projects in favor of 1 bedroom/efficiency units. Family units should have as-high or higher transit/bike/pedestrian trip potential within a TOD area than small units, on a per square foot basis.

We appreciate your consideration of this request. Given the schedule for approval of the guidelines and submittal of grant applications, and the currently unfavorable criteria for suburban locations like San Bernardino County, it is unclear whether there will be sufficient time to prepare competitive project applications. But putting the proposed changes in place will provide greater certainty for project applicants that their projects will have a chance to compete. If you should have any questions about this letter please contact Steve Smith, SANBAG Director of Planning at (909) 884-8276 or [ssmith@sanbag.ca.gov](mailto:ssmith@sanbag.ca.gov).

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