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Secretary
California Environmental Protection Agency
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Re: Comments on Draft Second Triennial Investment Plan Concept Paper, FY 2016-17 through 2018-19

Gentlemen:

In response to the request for feedback, the Santa Barbara County Association of Governments' (SBCAG) offers the following initial comments on concepts for the Second Greenhouse Gas Reduction Fund Triennial Investment Plan.

Creating more compact infill development patterns, encouraging active transportation and public transit usage, and protecting agricultural land from sprawl development are all goals supported by the Santa Barbara County Association of Governments' adopted Regional Transportation Plan-Sustainable Communities Strategy. In keeping with its role as the Metropolitan Planning Organization, Regional Transportation Planning Agency, and Congestion Management Agency for Santa Barbara County, SBCAG's comments focus on emission reductions from the transportation & sustainable communities sector.

- 1. Direct Funding for MPO Sustainable Community Strategy Planning and Implementation Needed.** The concept paper recognizes transportation as largest single source of GHG emissions in California and acknowledges that much more must be done to reduce transportation emissions to meet the State's ambitious GHG reduction goals. It also recognizes the central role and importance of Sustainable Communities Strategies (SCSs) in achieving those goals.

It is vital that the next triennial GGRF investment plan dedicate substantial funding to support MPOs' SB 375 planning efforts and implementation of SCSs. SB 375 tasks MPOs and RTPAs with crafting and implementing long-range transportation plans to meet regional targets for reducing GHG associated with regional travel demand. Without effective regional planning, no framework exists to shape future growth patterns and prioritize transportation system investment to assure that regions achieve GHG reduction goals.

Member Agencies

Buellton ▪ Carpinteria ▪ Goleta ▪ Guadalupe ▪ Lompoc ▪ Santa Barbara ▪ Santa Maria ▪ Solvang ▪ Santa Barbara County

The concept paper states that the *“Strategic Growth Council and transportation programs funded by the GGRF are supporting implementation of [SCS] strategies”* and that *“[t]he 60 percent continuous GGRF appropriation to these project types supports implementation of sustainable community strategies . . .”*

However, despite the significant additional responsibilities placed on MPOs by SB 375, so far no GGRF monies have been directed to support SCS planning. In first round of Sustainable Communities Strategies, Prop. 84 funding was available on a competitive basis to support MPOs’ planning efforts. At this point, no comparable funding source exists. Without a dedicated funding source, MPOs will not be able to carry out their expanded responsibilities under SB 375, which include growth projections, land use and transportation modeling and other highly technical and resource-intensive work. As a share of total GGRF funding, MPOs’ planning needs are modest, but have an outsized and directly measurable effect on GHG reductions.

Meanwhile, GGRF funding dedicated so far to SCS implementation, while welcome, has been applied in a scattershot fashion that does not allow for meaningful input on project selection or coordination by MPOs.

2. **Geographic Equity.** The Second Triennial Investment Plan should explicitly embrace and apply principles of geographic equity that assure that smaller regions receive a proportionate share of GGRF funding dedicated to transportation and sustainable communities. While smaller regions of course represent lower overall transportation vehicle emissions, they too face important challenges in establishing sustainable patterns of growth and deserve and require funding support to meet those challenges.
3. **Disadvantaged Communities Policy Too Limited.** SBCAG generally supports integrated projects as proposed by the concept paper that create jobs in disadvantaged communities. Jobs in and near disadvantaged communities that help correct existing jobs/housing imbalances have the effect of reducing commute distances and therefore vehicle emissions and commute costs for residents in time and money.

However, with respect to affordable housing, a broader investment plan policy is needed that incentivizes new affordable housing in high cost housing areas near job centers, not just where such disadvantaged communities currently reside. Fundamentally, GGRF investment in affordable housing must align with SCS growth planning, otherwise such investment may have the opposite of the intended effect: increasing commute distances, vehicle emissions and travel costs on the most vulnerable members of the population. By incentivizing housing growth in the wrong places, the current approach to helping disadvantaged communities threatens to undermine both regional SCSs and AB 32’s overarching goal of GHG reduction, while failing to help many, real disadvantaged populations.

Finally, the definition of “disadvantaged communities” adopted by CalEPA is overly technical and fails to recognize many communities that meet the common sense definition of “disadvantaged” based on straightforward application of Census criteria such as income, education and race/ethnicity, as well as indicators of jobs-access and housing affordability. We advocate for a more common sense and flexible definition such as that used for the Active Transportation Program.

4. **MPO/RTPA Role.** A significant MPO role in project selection and prioritization of transportation investment is desirable. As a result of their extensive regional planning efforts, MPOs often know and understand local project priorities better than state agencies, and have unparalleled experience in project selection and delivery as well as the capacity to distribute funding and help implement projects.

Thank you again for the opportunity to comment and please do not hesitate to contact me with any questions.

Sincerely,



Jim Kemp
Executive Director

cc: File (SP 45-06-01)0
Richard Corey, Executive Officer, ARB
Bill Higgins, Director, CALCOG

