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Ms. Mary D. Nichols, Chair
California Air Resources Board
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Dear Ms. Nichols:

SUBJECT: Comments on Draft Funding Guidelines for Agencies that Administer California Climate Investments

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the Draft Funding Guidelines for Agencies that Administer California Climate Investments.

As the Metropolitan Planning Organization for the San Diego region, SANDAG is responsible for preparing a Sustainable Communities Strategy (SCS) that integrates the region's land use and transportation plans to show how future investments will reduce greenhouse gas (GHG) emissions. The California Climate Investments (CCI) program is an important source of funding for implementation of the SCS and a critical component of the State's efforts to achieve GHG emissions reductions and other important co-benefits for California, including benefits to disadvantaged communities.

With this in mind, SANDAG would like to comment on the following components of the Draft Funding Guidelines:

Coordinating Investments and Leveraging Funds

SANDAG supports guidance by the California Air Resources Board (ARB) for administering agencies to coordinate and leverage their resources to provide multiple benefits. Several of the CCI programs share similar and/or complementary criteria and objectives. To support the most productive use of state funds, it would be helpful for administering agencies to coordinate their application timelines and components. Staggering the timelines to allow the programs to build off of one another, rather than compete with, would support maximum leveraging of the various funding sources. Consistency between program applications regarding common components, including GHG reductions and disadvantaged community and co-benefits, would streamline the process for both applicants and reviewers, thereby encouraging multi-program coordination.

Job Creation

ARB includes job creation as both a guiding principle and potential benefit for CCI programs. When considering the reporting requirements for agencies to quantify job creation, SANDAG encourages ARB to consider the indirect job creation benefits that transportation projects provide. Increased transportation connectivity is critical to bridging the gap between individuals and key employment centers. Providing mobility options for individuals to reach jobs, rather than directly creating the job, should be considered a benefit as well.

Investments to Benefit Disadvantaged Communities: Transit Projects

Table 2.A-2, Step 2, describes the criteria to be used to evaluate whether a transit project provides direct, meaningful, and assured benefits to a disadvantaged community. It currently includes bus rapid transit (BRT) service within the criteria for local bus transit service. However, BRT traditionally is considered in the same category as intercity rail, commuter bus or rail transit – which are all examples of Regional Transit service. Similar to these transit options, BRT includes fewer stops than local bus service to provide expedited travel times.

As such, SANDAG encourages ARB to instead include BRT within criteria C and D and to expand the catchment area to one mile. Studies have shown that riders are willing and likely to travel up to a mile to reach Regional Transit stations. (Suggested revisions shown in Attachment 1.) Similarly, SANDAG encourages the catchment area in Table 2.A-1, Step 2 criteria C and Table 2.A-2, Step 2 criteria F and G be changed to one mile. Making these changes would help align the criteria with statewide efforts to improve first and last mile connectivity to transit services.

Investments to Benefit Disadvantaged Communities: Active Transportation Projects

SANDAG encourages ARB to develop criteria that more directly account for the benefits provided to disadvantaged communities through active transportation projects. Possible criteria could include first/last mile connectivity to transit or the project's use as an alternate to transit or driving. SANDAG would be happy to work with ARB to help develop the appropriate criteria.

Thank you for the opportunity to comment on the Draft Funding Guidelines. If you have any questions, please feel free to contact Robyn Wapner, Senior Legislative Analyst, at (619) 699-1994 or by email at robyn.wapner@sandag.org.

Sincerely,


GARY L. GALLEGOS
Executive Director

GGA/RWA/asa

Attachment

Attachment 1

C. Project provides improved **Regional Transit service (including** intercity rail ~~(and related feeder bus service)~~, commuter bus, **bus rapid transit**, or rail transit) service for riders using stations or stops in a ZIP code that contains a disadvantaged community census tract or within ~~1/2~~ **1** mile of a disadvantaged community (e.g., new lines, express bus service); or

D. Project provides improved **Regional Transit service (including** intercity rail ~~(and related feeder bus service)~~, commuter bus, **bus rapid transit**, or rail transit) connectivity for riders using stations or stops in a ZIP code that contains a disadvantaged community census tract or within ~~1/2~~ **1** mile of a disadvantaged community (e.g., network/fare integration, better links between local bus and intercity rail, bicycle racks on rail); or