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Board of Directors
Sacramento Area Council of Governments
1415 L Street, Suite 300
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November 7, 2019

RE: SACOG 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy

Summary

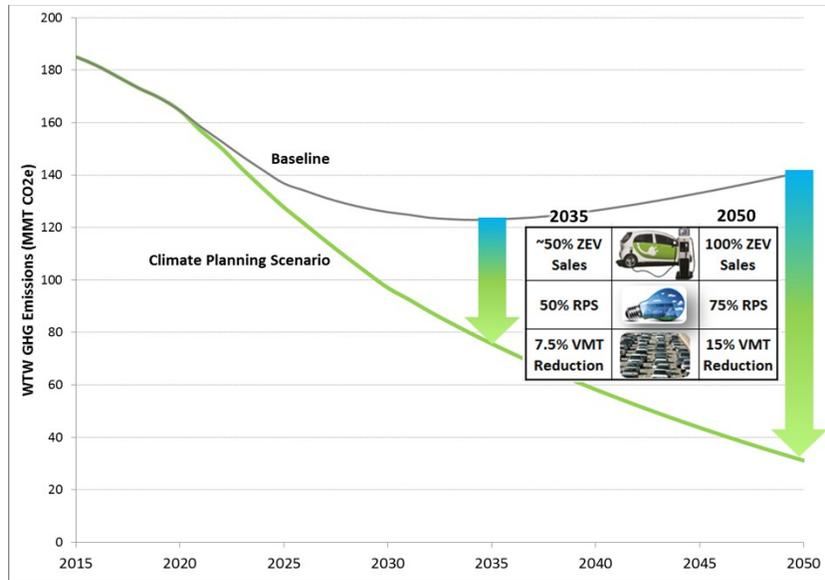
The Sacramento Area Council of Governments (SACOG) has put forth a sophisticated Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), a regional plan that the region's jurisdictions should follow. While this regional plan is not as strong as we feel it could be, the 2020 MTP/SCS is a viable strategy for the region to meet its regional greenhouse gas (GHG) reduction targets mandated by the California Air Resources Board (CARB) per Senate Bill 375 (2008).

The plan represents a reasonable compromise between what the region could accomplish if the political will existed, and the reality of much more expansive car-oriented, low-density growth that is actually being actively pursued by some of the region's jurisdictions on the ground. ECOS would prefer a greater percentage of transportation investment to non-auto modes, and a much more compact land use footprint than proposed. The Sacramento region is not meeting its mandated GHG reduction targets because local jurisdictions are not complying with the strategy that SACOG has laid out for them, and the State must do more to ensure compliance of local authorities to our Sustainable Community Strategies, as well as to ensure the State's own investments are aligned with its climate laws.

CARB's [2017 California Climate Change Scoping Plan](#) outlines the State's strategy to meet GHG reduction goals mandated by AB 32 and SB 32 (80% below 1990 levels by 2050). As illustrated in the graph below, even with 100% zero emission vehicles and 75% of energy production from renewable sources, we would still need 15% more vehicle-miles-traveled (VMT) reduction *beyond* what is projected by our current Regional Transportation Plans / Sustainable Community Strategies ([2017 Scoping Plan](#), p. 101).

Clean vehicles and clean energy will not alone be sufficient for achieving our goals. We must significantly change historic growth patterns to enable people to drive less. "VMT reduction" is a very good proxy metric for GHG reduction from improved land use and transportation, but also for the many co-benefits to natural resource conservation, public health, and social equity that this improved land use can provide.

Yet, despite broad recognition of this need, CARB's most recent [2018 Progress Report](#) on SB 375 (2008) implementation has illustrated that per capita VMT is going up in California, not down, and none of the State's regions are on track to achieving their respective GHG reduction targets through improved land use and transportation (reduced VMT) as mandated by SB 375.



(ARB Draft Scoping Plan, 2017)

From the inception of the “Blueprint“ which became the model for SB 375, SACOG has been a national leader in demonstrating the benefits of integrating transportation and land use planning. SACOG’s travel demand modeling has since been as sophisticated as can be found anywhere, and that sophistication continues today. In recent years SACOG has developed innovative programs, and provided technical assistance and policy guidance to push the region forward, including: having an integral role in negotiating Sacramento’s highly successful bike and scooter share program; aid in coordination of a smart-transfer platform between transit systems; development of the Civic Lab program to promote mobility innovation; the Transit-Oriented Development Tool Kit and ensuing Action Plan; and regional emergency preparedness guidance, to name a few.

Despite these laudable efforts, the Sacramento Region has not met its mandated 2020 GHG reduction target, and is not on track to meet its 2035 target. ECOS believes that SB 375 is one of the most important laws ever passed by California, but it is clear that successful implementation is going to take more than the current regulatory paradigm that SB 375 provides to integrate land use and transportation planning effectively to achieve state mandates.

The region and the State can and must do more. Our local agencies must begin altering their growth plans in compliance with the regional plan with urgency. The State must provide more tools to ensure local compliance, and the State must also take action to ensure its own transportation dollars are allocated in compliance with its own climate and equity goals.

ECOS does not believe that SACOG’s plan is the region’s primary inhibitor to achieving our climate goals. Following are suggestions to improve the 2020 MTP/SCS within SACOG’s authority.

Land use scenario

ECOS believes that the growth footprint of the region for the next 20 years could and should be much more compact than the proposed plan. However, we recognize that the proposed land use scenario is unrealistically compact compared to the current expansive planning of many of the region’s jurisdictions.

ECOS questions the reclassification of some communities that were considered “Developing” in 2016 as “Established” in 2020, but this reclassification only shifts the perception of the infill vs. greenfield development proportion perhaps a couple of percentage points. ECOS is not so concerned with whether the proposed land use footprint presumes 37% or 39% greenfield development, when we think the

conversation needs to be about how the region's greenfield development could be reduced to 10% or less.

Only political constraints, not physical constraints, prevent the region from realizing such a compact growth scenario. In our comments on the 2016 MTP/SCS, ECOS wrote:

Referring to MTP Table 3.10, roughly 75% of the total 1,287,421 acres of the Established Communities category in the MTP is not currently developed. The existing developed area of the Established Communities is 264,242 gross acres, with 16,619 allocated for development. "Center/Corridor Communities" have 36,821 gross acres, with 26,684 currently developed and 3,825 designated for development in the MTP. Current residential density in the developed portion of Established Communities is quite low: 2.6 dwelling units (DUs) per gross acre (GA) and 4.1 DUs per net residential acre (NRA). The numbers are slightly better in the Center/Corridor Communities: 4.0 DU/GA and 10.5 DU/NRA respectively, (DU/GA, MTP Tables 3.2 and 3.10; DU/NRA, MTP Table 5A.3). By comparison, the *average* density in all of San Francisco is 12 DU/GA, and one million people in the densest 33 ZIP codes of Los Angeles live at a similarly high average density (2010 U.S. census).

... we can make rough numerical estimates of the densities that could be achieved by a "what-if" strategy of directing growth solely into already developed portions of Centers and Corridors and Established Communities. Assuming all anticipated growth is equally divided between these two categories (increase of 142,448 DUs in each), this strategy would push the gross residential density in Established Communities to 3.1 DU/GA (4.9 DU/NRA), and 9.4 DU/GA (24.4 DU/NRA) in Centers & Corridors. Even in this extreme all-infill scenario, the densities in Established Communities are still not high values for transit-oriented density ... and those in Centers/Corridors still fall short of densities achieved in both San Francisco and Los Angeles.

Note that the above numbers are all specific to the 2016 MTP, as we were not able to locate the equivalent data in the 2020 to update these density estimates. Yet, as the population growth estimates in the 2020 plan are less than in 2016, it is safe to assume that hypothetical densities referenced here would be even less in such a scenario. Of course, reallocation of anticipated growth is not this simple, but we offer this rough calculation as an illustrative reference point for how much potential for infill there is in the region that is not being capitalized upon.

Regardless of how much more compact regional growth could ideally be, ECOS acknowledges SACOG's proposed MTP/SCS as an ambitious, viable compromise for the region to meet our required GHG reduction targets. However, the reality is that many of the region's jurisdictions are planning peripheral, automobile-oriented, greenfield development.

The table below (derived from the table on page 5 in Appendix C of the 2020 MTP/SCS) compares the growth forecast by community type in the MTP compared to planned "Build Out" of the region's cumulative general plans.

The planning horizons of the region's respective general plans range from 2030 to 2050, an average of which makes these growth projections at "build out" roughly commensurate with the horizon year of the MTP/SCS. The total build out of the general plans of the Sacramento region anticipates 660,760 houses beyond existing stock in 2016 – well more than **2.5 times** SACOG's estimate of housing growth for 2016-40. Of this 660,760 figure, over 60% of the growth is greenfield development: with **2.3 times** more growth in SACOG's "Developing Community" areas, and **17 times** more growth in "Rural Residential" areas than in the SCS.

2020 MTP/SCS, Appendix C, Land Use Forecast, Regional Totals

Jurisdiction / Community Type	Existing Conditions		Draft Preferred Scenario		Build Out Estimate		Unrealized Growth	
	Total in Year 2016		Total in Year 2040		Total at Build Out		Build Out minus Projected Year 2040	
	Jobs	Housing Units	Jobs	Housing Units	Jobs	Housing Units	Jobs	Housing Units
Region Total	1,060,960	921,150	1,330,490	1,181,170	2,169,010	1,581,910	838,520	400,740
Center and Corridor Communities	370,920	113,920	453,750	200,530	581,680	224,240	127,930	23,710
Established Communities	644,370	711,050	789,430	792,200	1,066,430	848,780	277,000	56,580
Developing Communities	12,130	20,480	52,870	110,000	301,670	230,980	248,800	120,980
Rural Residential Communities	30,130	73,750	31,540	76,550	73,200	122,240	41,660	45,690
Areas Not Identified for Growth in the MTP/SCS by 2040	3,410	1,950	2,900	1,890	146,030	155,670	143,130	153,780

153,780 planned units are completely outside of the SCS footprint, and these figures do not include major potential expansion areas that are currently being pursued, including proposals such as a full build out of Cordova Hills, the “Natomas North Precinct” and “Upper West Side” proposals, adopted and continued applications to expand the Sphere of Influence of the City of Elk Grove, further speculation to expand south of Folsom, and significant rural residential growth in Placer and El Dorado counties that is not anticipated by the SACOG plan.

If realized, any one of these expansion proposals could be a detriment to successful implementation of SACOG's plan; taken together these plans would certainly eliminate any possibility of the region meeting its mandated GHG reduction targets.

The 2040 transportation plan that is proposed by the 2016 MTP/SCS Update to meet our emission reduction targets necessarily relies on significantly increased residential densities. Jurisdictions in the Sacramento region must make a commitment to constrain their growth patterns to meet these densities or the multi-modal transportation system as is currently envisioned for 2040 will never be built.

Environmental Justice and Displacement

SACOG offers very sophisticated analysis of the location and needs of disadvantaged communities in the region, but we are disappointed at the lack of discussion or analysis of the risk of displacement to the region’s most vulnerable residents in the plan. This could have been avoided by integration of work on this issue that SACOG has been developing in parallel to the MTP, in the Transit-Oriented Development Tool Kit and Action plan.

Success of the 2020 MTP/SCS in meeting our climate goals relies on significant investment in infill development and supporting transportation infrastructure. Yet, infill investment inevitably adds to gentrification and displacement pressures on low-income residents in these existing communities. Thus, this needed infill investment *must* be coupled with anti-displacement protections to guard against the perpetuation of historical patterns of segregation, to ensure the vulnerable residents of these communities equitably reap the benefits of these investments, as well as to ensure that our ability to meet our climate goals is not undermined by forcing low-wage workers into long commutes.

Low-income residents use transit and active transportation options more than others, if it’s available. Displacing these residents to the urban periphery not only disproportionately burdens these families, but also eats up agricultural land and open space and increase VMT and associated GHG emissions. Displacement is the Achilles heel of smart growth policy and is a problem we can no longer afford to ignore.

SACOG's TOD Tool Kit recognizes this, offering a substantial discussion of both the factors that contribute to displacement and menu of policy remedies that could be employed by jurisdictions to mitigate displacement pressures.

SACOG's first priority should be to integrate this work from the developing TOD Action Plan into the MTP. Further, where SACOG *does* have direct control of discretionary funding, having anti-displacement strategies in place should be an explicit criteria for allocation of these funds. This should be of particular importance for awarding funds under SACOG's proposed "Green Means Go" program to subsidize and accelerate infill development, if it were to be funded by the State.

Looking forward, SACOG (and all Metropolitan Planning Organizations (MPOs)) need to provide leadership in developing a quantitative methodology for analyzing displacement risk and the potential impacts to housing economics and VMT performance that displacement poses.

Revenue Presumptions

SACOG's plan relies on significant presumptions about future revenues that are not entirely certain or within SACOG's control to implement. The MTP/SCS presumes revenues from two local transportation tax measures with undetermined content and not certain to pass; it anticipates a State budget allocation for the proposed "Green Means Go" program; and it relies on significant revenues from road-pricing strategies that would require State and local actions to authorize and implement.

If these new revenue streams are realized, it is imperative that SACOG, the local jurisdictions and the State ensure that the revenues are strictly used in accordance with the MTP/SCS and our climate goals, and are not just perpetuating the status quo. For projects funded by the proposed "Green Means Go" program, SACOG should provide VMT performance criteria, inclusionary housing targets, and anti-displacement strategies.

Road-Pricing Strategies

We agree that new road pricing strategies should be explored to replace diminishing gas tax revenues (due to better vehicle efficiency) and decreased federal transportation investment. Any such strategies should ultimately be aimed not only at replacing lost revenues, but also to reflect the true cost of driving on our environment and communities, in an effort to shift travel behavior to non-auto modes.

However, in employment of such future strategies, care must be given to identify and mitigate adverse impacts on low income communities, particularly low-income rural communities, and we commend SACOG for its expressed intent to explore these topics in its recent road-pricing pilot proposal. We are concerned about reliance on road-pricing strategies that would require local and State actions, and on the significant VMT and GHG reductions presumed due to these strategies.

Road-pricing strategies have the potential to reduce driving, if employed correctly, but this will depend on whether there are viable travel alternatives to driving for the region. Raising the cost of driving will not stop people from driving to work if driving is the only way to get there. SACOG needs to explain how revenues from these pricing strategies will be used to provide non-auto alternatives to account for the planned VMT reduction.

We question whether VMT/GHG reduction requiring State action should be counted towards a region's GHG reduction target under SB 375, or towards the identified VMT reduction that is needed by actions of the State *beyond* the SB 375 targets to meet California's 2050 climate goals. It can't be both, and this is an issue that must be resolved by the MPOs and the Air Resources Board.

SACOG should encourage local air pollution control districts to adopt indirect source rules, similar to that adopted by the San Joaquin Valley Unified Air Pollution Control District, to mitigate the VMT emissions caused by new land developments. Funds generated by these rules should be directed to funding alternatives to these emissions, for example, by funding public transit.

Alternatives Analysis

We are disappointed that SACOG decided to dismiss our recommendation to analyze an all-infill scenario as "not realistic or feasible." We acknowledge that a 100% infill scenario would likely have practical physical constraints that would make it infeasible, but SACOG should analyze the performance of the most compact scenario that is physically feasible (even if not politically feasible) as a reference point. We believe that analysis of the consequences of the much more expansive planning that is actually occurring in the region beyond the SCS footprint would be extremely valuable.

Of the alternatives that were analyzed, we note that both the slightly-more-compact and slightly-more-expansive scenarios were all projected to have the same GHG reduction performance as the Preferred Scenario, with the only apparent variable being the degree of road-pricing that was applied.

ECOS does not disagree with the emphasis put on the importance of the cost of driving in this analysis, or the assertion that if we make poor land use decisions we should pay for it. But we are not convinced that increased road-pricing strategies alone will fully mitigate the impacts of more expansive land use, absent alternatives to driving. Indeed, these alternatives might be funded by revenues from road pricing.

Further, reducing the variables of an alternatives analysis solely to the cost-of-driving fully illustrates the many impacts associated with more expansive growth, such as loss of biodiversity, agricultural land and open space; risk of fire or flood, and health and economic impacts on our communities. We do not expect that an alternatives analysis should fully duplicate for each alternative all the analysis of the MTP's preferred scenario. However, an analysis that pivots on the cost-of-driving alone minimizes the importance of land use decisions in achieving GHG reduction and other co-benefits.

Transportation investments

SACOG's proposed plan offers a viable strategy for the region to meet our mandated GHG reduction targets and represents a improved future. We believe the region should more aggressively invest in non-auto infrastructure to ensure the next twenty years of growth will indeed follow SACOG's plan accordingly.

ECOS believes a greater proportion of investment in transit and active transportation is needed, and we are disappointed that investment in road capacity increases in the 2020 plan compared to the 2016 plan. We are also disappointed to see SACOG follow a statewide trend in classifying some road-widening projects as "maintenance" which, if classified correctly as "capacity" projects, would further increase the proportion of road capacity funding. Adding auxiliary lanes, even if for good reason (restricted high-occupancy-vehicle lanes etc.), still adds capacity and should be classified as such. This mis-classification is a trend that must stop.

Highway capacity projects, many of which were already in planning prior to the passage of our climate laws, are a large part of why regions across the state are not meeting their VMT and GHG reduction targets. Many studies have shown that investing in added road capacity induces additional VMT, does not reduce congestion effectively, diverts resources from alternative modes that would reduce congestion, adds to already high road-maintenance costs, and promotes low-density car-oriented growth.

Local jurisdictions and the State should reconsider whether these road capacity projects are worth pursuing, and, if so, how to mitigate for their VMT impacts. MPOs, including SACOG, have an important role to play in these considerations. SB 743 implementation is a critical opportunity to do so. SACOG should provide more guidance to local jurisdictions on effective implementation of SB 743. Particularly, SACOG should provide guidance on how regional facilities could be mitigated and funded through collaborative strategies, such as mitigation banking.

In addition to the concern for the proportion of funding directed to road capacity, ECOS is also concerned with the timing of these projects. Many would occur in the early years of the plan, while the major transit investments would be funded in the final years of the plan.

ECOS would like to see our transit investments made earlier. We recommend that SACOG develop an explicit “phasing methodology,” to determine the cost and benefits associated with the timing of a project and the cumulative effects on the performance of the plan depending on that timing. Consistency with the SCS, for both transportation infrastructure and land use development, should take timing into account. While developing such a phasing methodology may go beyond the mandate of SB 375, it is a necessary step for successful SCS implementation, and SACOG should provide continued leadership in this regard.

VMT and GHG determinations

In the 2020 plan, SACOG does a better job than before in explaining travel behavior in the region and the importance of VMT reduction and the need for change. SACOG has determined explicit VMT reduction targets to meet California’s 2050 climate goals, and has illustrated that the region is not meeting them. What is still lacking is an explanation of how these methodologies would be applied to specific projects, or across the plan cumulatively.

To fully exhibit how the plan operates, SACOG should break out the major road and transit investments, with a full per-project performance and cost/benefits analysis. This would go beyond the SB 375 mandate, but would illustrate how the major investments of regional import interact and would go a long way to understanding the trade-offs to be considered. This would be a valuable next step for SCS implementation, and SACOG's leadership would be valuable.

While the explanation of VMT and the methodologies employed are very informative, the MTP/SCS provides little illustration of how final determinations are made. Specifically there is little clarity on how a reduction of 6% in VMT per capita translates to a 19% GHG reduction. This determination continues to be a “black box” of modeling to the layperson, which SACOG has the tools to better illuminate.

Conclusion

We hope that these observations and suggestions on the 2020 MTP/SCS are viewed as constructive. We applaud SACOG for a great body of work that has led to this plan. SACOG can do better, but the primary impediment to the region meeting its mandated GHG reduction targets is not SACOG’s plan. The locals, the regions and the State must all do more to ensure we meet our climate, health, and equity goals, and to ensure that all of our communities prosper. ECOS is committed to work with SACOG and the region to ensure this happens. Thank you for the opportunity to comment.

Sincerely,



Ralph Propper, President
Environmental Council of Sacramento