



Building a Coalition for a Comprehensive  
Transportation System In Los Angeles County

July 31, 2015

Ken Alex, Chair  
Randall Winston, Interim Executive Director  
Strategic Growth Council (SGC)  
1400 Tenth Street  
Sacramento, CA 95814

**RE: Affordable Housing Sustainable Communities (AHSC) Program: Round 1 Award Recommendations**

Dear Chairman Alex and Interim Director Winston:

**Introduction**

We want to thank the SGC and staff for their exceptional efforts in creating the first ever Affordable Housing and Sustainable Communities program. Seeking to fund projects that integrate transit and transit related infrastructure into our communities while recognizing the importance of incorporating affordable housing so that high propensity transit users have easier access to the system as a strategy to reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) is truly exceptional. To our knowledge it is likely unique in the world. Including an emphasis on addressing our community's social justice challenges as well by working to serve disadvantaged communities elevates this effort to the truly visionary. Congratulations.

Looking forward, we are excited to consider the possibility that we can do even better in the future.

**Summary of recommendations**

- 1. Removing the jurisdictional cap, and creation of an allocation mechanism that will ensure geographic equity with a threshold for GHG reduction performance**
- 2. Reducing the role of resource leveraging in the ranking or scoring of projects.**
- 3. Role of Metropolitan Planning Organizations**

***Removing the jurisdictional cap and allocation formula***

While SGC adopted a \$15 million jurisdictional cap as a mechanism to ensure some equity in the distribution process we believe this indirect tool has actually served the contrary purpose. We urge the SGC to instead be more direct in this matter. The larger cities in our urban environments offer some of the most cost effective opportunities for VMT and GHG reductions. Urban metropolitan areas such as the Los Angeles County have substantial opportunity to integrate land use and development with transportation infrastructure.

Still, there are important VMT and GHG reduction opportunities in other areas that have a more suburban or rural urban form. We agree with our colleagues in the Sustainable Communities For All (SC4A) coalition and propose eliminating the \$15 million jurisdictional cap in favor of a regional allocation scheme more sensitive to GHG reduction opportunities, population, and disadvantaged communities. We agree with SC4A as well that SGC can find models in the practices of the California Tax Credit Allocation Committee (CTCAC) and Active Transportation Program (ATP), which both offer regional allocations that include a rural set-aside.

**Reducing the role of resource leveraging in the ranking or scoring of projects.**

In the first round, capital leverage served essentially as a first-cut standard in the AHSC program. Unfortunately, this seems to create a “them-that-gots-continue-to-gets” dynamic and may run contrary to the social equity objectives of the program and may not serve its long run interests nor give optimal VMT and GHG reduction results. Projects with high-emission reduction potential that also best serve disadvantaged communities may not be the projects with ready access to capital. While we agree that leveraging other resources is in general an important objective, we urge you to not make this such a threshold requirement or consider other types of community investments, such as nearby transportation investments, as equally or more relevant.

***Enhancing the program’s commitment to active transportation and first mile last mile infrastructure development***

Move LA strongly supports the integration of affordable housing development near to transit services into the AHSC program and was among the early proponents of that programmatic objective. However, we are concerned that opportunities to develop first-mile-last mile and active transportation infrastructure in built-out communities with significant nearby transit services is not also being served. Such investments may in fact be the “low-hanging fruit” for achieving our overall emission reduction objectives. We believe the AHSC can deepen VMT and GHG reductions by ensuring such transportation infrastructure projects are also funded in this program.

***Enhancing the role of Metropolitan Planning Organizations***

As the SGC conducts its process to refine guidelines for the Affordable Housing and Sustainable Communities Program, regional planning agencies, such as Metropolitan Planning Organizations and Regional Transportation Planning Agencies, should serve a more integral role in program development and implementation especially with respect to infrastructure investments such as those we mentioned above. (With respect to projects that include affordable housing we recommend continuing the current program framework.)

We believe that doing so is not only the best way to get solid performance based infrastructure improvements funded and developed, it will strengthen the overall Sustainable Communities Strategies process. We need to strengthen the commitments of our communities to this process and to those plans. Doing so will help us to ensure the goals of AB 32 and SB 3735 are realized to the fullest extent possible.

This is certainly true in the Southern California region where there is an awkward division of planning and implementation responsibilities between the MPO, the transportation commissions, cities and counties, a product of a legislative history unfamiliar to us. SCAG as the MPO does an excellent job of working with communities and mobilizing interest as demonstrated by the outstanding Compass Blue Print Program and the remarkable consensus achieved in the RTP/SCS approval, yet has very little resource to promote or ensure implementation. Transportation commissions with the authority and perhaps the resources for implementation, if they were lucky enough to get 2/3 vote on some recent transportation funding measure, are not themselves responsible for SCS planning and may be constrained by the very ballot measures that provide them resources. The resource constraints of cities and counties in California (since Proposition 13) is legendary and needs no explication from us.

Providing a direct role of the MPO in the implementation of infrastructure related investments will not only serve the projects themselves well, it will strengthen the ability and willingness of our community institutions to commit to this effort. We believe that is an essential ingredient to long term success whatever the disputes of the moment may be.

In the long term, we are encouraged to hear staff and Council members considering many of the issues that would lead to more thoughtful, well planned, innovative, and integrated projects. Moving away from targeting shovel-ready projects and rewarding leverage and towards earlier investment in projects in earlier stages of development will be an important path to better outcomes.

Thank you for your consideration.

A handwritten signature in black ink that reads "Denny Zane". The signature is written in a cursive, slightly slanted style.

Denny Zane  
Move LA  
Executive Director

Cc: Marlene Grossman, President, Move LA Leadership Board