



500 S. Main Street, Suite #410, Orange, CA 92868 | P: (714) 953-1300 | F: (714) 953-1302 | [www.ACCOC.org](http://www.ACCOC.org)

May 4, 2017

The Honorable Ben Allen  
State Capitol, Room 5072  
Sacramento, CA 95814

**RE: SB 150 (Allen) Regional transportation plans. – OPPOSE AS AMENDED**

Dear Senator Allen:

The Association of California Cities – Orange County (ACC-OC) would like to express its opposition to the proposed legislation, Senate Bill 150 (Allen). The bill would require the sustainable communities strategy (SCS) to outline the region's transportation planning (RTP) and programming activities, with transportation projects to be prioritized based on a project's ability to meet certain criteria and objectives relative to reduction in air pollutants and vehicle miles traveled. This is concerning to cities in Orange County and throughout the State because it moves away from the intended local flexibility to meet State Air Resources Board (Board) greenhouse gas (GHG) reduction goals, originated in SB 375.

Currently, each transportation planning agency has prepared and adopted a RTP directed at achieving a coordinated and balanced regional transportation system to best serve their communities and met state standards. These systems take into consideration mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities that best meet the SCSs run by the regional metropolitan planning organizations (MPO). The SCS is designed to achieve certain greenhouse gas emissions reduction targets for 2020 and 2035 established by the State Air Resources Board. While this process is labor intensive and requires regional coordination among cities and MPOs, it provides flexibility for local governments when meeting their State obligations.

SB 150 would reduce local flexibility by focusing GHG reduction methodologies to a Vehicle Miles Traveled (VMT) model. Beginning on September 1, 2018, the State Board would monitor each MPO's SCS or alternative planning strategy, and submit a progress report every four years to the California Transportation Commission. The report would include an assessment of whether the MPO is on track to meet certain targets relating to reduction of vehicle miles traveled and reduction of emissions. This could result in the restructure of local project priorities, as to ensure that VMT projects are being completed when reports are analyzed at the state level. SB 150 can also complicate criteria and eligibility for alternative funding, based on projects meeting transportation and emission reduction goals outside of SB 150's prescribed VMT programs. This could dramatically change RTP plans, and negatively affect a region's focus on providing a balanced transportation investment strategy.



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The ACC-OC represents the interests of the 34 cities in Orange County and the County of Orange, and is dedicated to supporting flexibility options for municipalities when having to implement unfunded State mandates. For this and the reasons described above, the Association of California Cities – Orange County opposes SB 150 standing with our local MPO's, and transportation partners. Should you have any questions about our position or about ACC-OC, please contact Diana Coronado, ACC-OC's Legislative Affairs Director, at (714) 953-1300 or at [dcoronado@accoc.org](mailto:dcoronado@accoc.org).

Sincerely,

Heather Stratman  
Chief Executive Officer  
Association of California Cities – Orange County

CC:

The Honorable Ricardo Lara  
Orange County Legislative Delegation  
Senate Appropriations Committee, Members  
ACC-OC Board of Directors