

ATTACHMENT

PUBLIC COMMENTS AND RESPONSES

DRAFT ADMINISTRATIVE AMENDMENT (SAFETEA-LU GAP ANALYSIS) to the 2004 RTP

Public Comments and Responses

In November 2006, the Southern California Association of Governments (SCAG) completed a draft gap analysis to bring the existing 2004 Regional Transportation Plan into compliance with the federal requirements set forth in the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU).

The Draft Gap Analysis was submitted to Federal Highway Administration and Caltrans for review and comments in November 2006. The Draft Gap Analysis was subsequently posted to SCAG's website on December 12, 2006 for a 30-day public comments period. On November 16, 2006, the Draft Gap Analysis was presented to SCAG's Plans and Programs Technical Advisory Committee for review by metropolitan planning area stakeholders. It was presented to the Transportation Conformity Working Group on November 28, 2006. SCAG's Transportation and Communications Committee reviewed and authorized the release of the Draft Gap analysis on December 14, 2006 for a 30-day public comment period.

The following table is a comprehensive summary of the comments received with regard to the Draft Gap Analysis and SCAG's responses respective to the issues raised. In sum, SCAG received comments from FHWA and Caltrans and has taken every step necessary to respond and follow through with requested actions.

Response to Comments
ADMINISTRATIVE AMENDMENT (SAFETEA-LU GAP ANALYSIS) to the 2004 REGIONAL TRANSPORTATION PLAN

REC DATE	NAME	AFFILIATION	COMMENT	RESPONSE
1/11/07	Rose Casey Deputy District Director	Caltrans District 7	The Department (Caltrans) has completed the review of the SCAG Administrative Modification (Gap Analysis) to 2004 Regional Transportation Plan (as amended in July 2006) and accepts SCAG's approach to comply with SAFETEA-LU requirements. It is the Department's opinion that this administrative modification document brings the existing 2004 RTP into compliance with SAFETEA-LU requirements and should allow SCAG to continue moving forward with the implementation of the 2004 RTP beyond July 1, 2007.	Comment duly noted.
12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>Comment 1 The SAFETEA-LU planning provisions will affect the planning process more than the final products. Therefore, as part of the gap analysis, FHWA expects that there will be specifically identified steps and schedules to address any gaps in the <u>planning process</u> for the 2008 RTP update. For a number of the items, SCAG makes a general comment that additional efforts will be undertaken as part of the 2008 RTP update, but no specific activities or steps are provided. These steps would be similar to the Action Plan SCAG developed for the 2004 RTP, but they will be for the development of the 2008 RTP.</p>	
			<p>Requested Action Specifically identify the steps that will be taken and their anticipated schedule to achieve full SAFETEA-LU compliance for the development of the 2008 RTP. Consider the following questions when identifying the step that will be taken for the 2008 RTP update process (see below for comments from Attachment 2).</p>	Final 'Gap Analysis' identifies specific action steps and milestones that will be pursued to ensure full SAFETEA-LU compliance of the next RTP.
			<p>• Safety of the System for Motorized and Non-motorized Users How will the Strategic Highway Safety Plan be incorporated into the 2008 RTP? What safety stakeholders are currently involved in the RTP process? Is SCAG trying to identify any additional stakeholders? Are the 2004 RTP safety goals, objectives, performance measures or strategies being updated? Will the transit System Safety Plan be incorporated into the 2008 RTP? Does SCAG have adequate safety data to support the development of the safety element?</p>	Final 'Gap Analysis' identifies specific action steps and milestones that will be pursued to develop a SAFETEA-LU compliant Safety Element for the Motorized as well as Non-motorized transportation systems in the next RTP.
			<p>• Increased Security of the Transportation System for Motorized and Non-Motorized Users Will the transit System Safety Plan be incorporated into the 2008 RTP? Are the roles of the public transportation operators adequately defined for purposes of system security for the 2008?</p>	Final 'Gap Analysis' identifies specific action steps and milestones that will be pursued to develop a SAFETEA-LU compliant Security Element for the Motorized as well as Non-motorized transportation systems in the next RTP. As described in the Gap Analysis, all available and relevant Transit System Safety Plans will be incorporated into this element. Transit safety and security issues will be vetted through the Regional Transit Task Force which is primarily comprised of transit operators.
<p>• Financial Constraint SCAG should strive for continued improvement to the revenue and cost elements of the RTP. How will project costs be updated on an ongoing basis? Does SCAG need to update financial information in the RTP based on the FHWA/FTA Interim Guidance on Fiscal Constraint of Transportation Plans and Programs?</p>	Improving revenue and cost elements of the RTP is an ongoing endeavor at SCAG. Significant improvements are underway for both revenue forecast/planning as well as project cost accounting, which will be fully reflected in the next RTP update. The final financial element of the next RTP will fully comply with the requirements of SAFETEA-LU.			

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12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>• Discussion of Environmental Mitigation Elements of the EIR process that address this requirement should be directly incorporated into the 2008 RTP. Do Resources agency contacts have to be reviewed to make sure all the interested parties are represented? Will SCAG contact these entities and ask how the consultation process could be improved? Has SCAG identified any additional resources where the data will need to be collected for the 2008 RTP? If so, how will SCAG collect that data? Will the process be modified as a result of the workshops SCAG held with the Resources Agencies?</p>	<p>As suggested, the 2008 RTP will directly incorporate elements of the EIR process that address the environmental mitigation requirement of SAFETEA-LU.</p> <p>SCAG will identify the consultation undertaken with federal, state, tribal, wildlife, land management, and regulatory agencies to make the 2008 RTP SAFETEA-LU consistent. In conducting the consultation effort, SCAG will review all contact information and ensure all interested parties are represented. SCAG will also contact the interested parties to inquire how to improve the consultation process.</p> <p>SCAG has just begun to analyze data resources for the 2008 RTP EIR. Most of the environmental data will be obtained from similar sources as in the 2004 RTP (California Department of Fish and Game, State Office of Historic Preservation, U.S. Fish and Wildlife Service, U.S. Department of Agriculture, etc.). SCAG is also consulting with resource agencies to obtain the most recent data, specifically data regarding open space and habitat resources. Additional environmental information will be collected from the appropriate resource agencies and staff as needed. SCAG welcomes input from the FHWA/FTA on additional data resources.</p>
			<p>• Consultation and Cooperation How will SCAG incorporate the state EIR process to meet the consultation and cooperation requirements for the 2008 RTP?</p>	<p>The RTP EIR is a companion document to the RTP. SCAG will summarize those elements of the EIR process that address the consultation and cooperation requirements in the 2007/2008 RTP.</p>
			<p>• Transportation Facilities Do the performance measures from the 2004 RTP have to be updated? Will SCAG need to include more explicit discussion of maintenance and operating costs within the financial constraint discussion?</p>	<p>The 2004 RTP includes performance measures intended to address the system maintenance/preservation issue. SCAG will further refine this measure in the next RTP update and continue to reflect the maintenance and operating costs within the context of financial constraint.</p>
12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>Comment 2 Fiscal Constraint Fiscal constraint continues to be a vital component of the transportation planning process under SAFETEA-LU. SCAG is currently updating project costs per the corrective action in the Federal certification report. This effort should be referenced in the fiscal constraint section of the gap analysis.</p>	
			<p>Requested Action Include a reference to supplemental certification documentation.</p>	<p>Specific reference to the work that is being completed as part of the supplemental certification documentation relative to project costs has been added to the final 'Gap Analysis'.</p>
12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>Comment 3 Public Participation Plan SAFETEA-LU compliant public participation plans are to be developed from a clean slate while documenting how interested parties were involved in the development of the procedures. If this document (gap analysis) was, in fact, produced in such a manner, please provide supplemental information.</p> <p>From the proposed public participation plan [page 3, item (i)] SCAG will hold any public meetings at convenient and accessible locations and times. SCAG informed the FHWA that it would no longer hold public meetings in the outlying areas of SCAG because of little to no attendance as well as the fact that public comments were not being received. The SCAG coverage area is extensive and varied in interest and population make-up, SCAG should address how it plans to give the outlying areas access to its public involvement process.</p>	

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12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>Requested Action</p> <ul style="list-style-type: none"> Please document how interested parties were involved in the development of the procedures. What methodology did SCAG use to create the draft? Further, please add that the public participation plan should be called a participation plan in the spirit of SAFETEA-LU. 	<p>SCAG's draft Public Participation Plan was developed and released for comment to a broad range of public and private interests. Development of the draft document spanned a five-month period and included a review of and enhancements to SCAG's existing adopted Plan based on previous lessons learned and public comments received on the 2004 RTP, a review of SAFETEA-LU requirements, review and comments by those who work with many of the interested parties identified in the SAFETEA-LU requirements, and a review of Public Participation Plans by other metropolitan planning organizations throughout the country.</p> <p>The draft Public Participation Plan was released for an initial 45-day public review and comment period and posted on SCAG's web site beginning October 17, 2006 through the close of the public comment period on December 8, 2006. A notice of the draft Plan's availability was posted in one major newspaper in each county (Los Angeles Times, Orange County Register, San Bernardino Sun, Riverside Press Enterprise, Ventura County Star, and Imperial Valley Press) plus La Opinion and the Chinese Daily News. In addition, copies of the draft Plan were distributed to 46 local libraries, 14 subregions, 16 Tribal Government Chairs, various environmental and resource organizations, federal and state agencies, representatives of the disabled, pedestrians and bicycle users, the county transportation commissions, air districts, and other interested parties. Copies of the draft Plan were also available at the November Regional Council meeting as well as SCAG's lobby (open to the public) during the entire public comment period.</p> <p>In response to comments received from FHWA in a letter dated December 13, 2006, SCAG extended the public comment period through February 26, 2007. During this period, SCAG was invited to make a formal presentation on the draft Public Participation Plan to bus operators on January 16 and the Orange County Council of Governments' Technical Advisory Committee meeting on February 6.</p> <p>SCAG continued its efforts to further reach out to agencies by sending additional copies of the draft Public Participation Plan to 38 federal and state resource agencies. This effort was followed up with two separate electronic reminder messages seeking comments and feedback on the Plan. In addition, SCAG invited interested parties (with a heavy emphasis on federal and state resource agencies as well as the subregions) to attend a presentation on the draft Public Participation Plan on Tuesday, February 6 in the SCAG offices. One subregional representative attended the presentation. During early February, SCAG telephoned each of the federal and state resource agencies once again seeking comments and offering to make presentations at the respective agency location. SCAG also reached out to the county transportation commissions both electronically as well as by telephone to elicit comments to the draft Plan. To date, SCAG has received comments from one Tribal Government, one member city, one county transportation commission, three subregions, two resource agencies and one private business.</p> <p>In general, those who responded indicated that they have received and reviewed the Public Participation Plan, that the plan looks fine and that they did not have any other specific comments. One commenter from a local natural resource agency indicated that they did not have the staff available to review this type of plan nor were they interested in an on-site presentation. However, they did offer to assist SCAG in draft plan distribution and further outreach when plans such as the RTP, RCP and RTIP are available. In total, SCAG's draft Public Participation Plan was available for public comment for a period of 133 days. SCAG has made every effort to reach out to interested parties, encourage feedback, and involve interested parties in the development of the Plan's strategies and procedures.</p> <p>SCAG discussed the pros and cons of referring to the Plan as a Public Participation Plan prior to the draft Plan's release and in the end chose to include the word "Public" based on the primary definition of the word "relating to or affecting all the people or the whole area of a nation or state or region." The word public instills the sense of people, mankind, community and without the use of the word public, this sense is lost.</p>

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12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<ul style="list-style-type: none"> Please identify how SCAG will provide access to its public involvement process throughout the region. 	<p>We have no knowledge that SCAG informed FHWA that it would no longer hold public meetings in the outlying areas of SCAG because of little to no attendance. In fact, the contrary is true. Our region is vast and we make every attempt to reach all corners of the region with our messages. During the past year, SCAG held over 150 documented presentations in all six counties throughout the SCAG region. In addition, SCAG continues to meet with its sister agencies in San Diego and Kern County on a regular basis. There has been renewed activity in the Southwest Compact Task Force efforts, including recent public hearings in Imperial County, Mexicali, Mexico and Yuma, Arizona. In addition, SCAG continues to expand its Member Relations Officers section to ensure that traditionally underrepresented segments within the region are appropriately served. SCAG has also taken significant steps to increase participation by Tribal Governments, most of which are located within the Inland Empire. This has occurred through numerous meetings with Tribal Governments and their representatives during the past four years. And the recent efforts by SCAG staff to conduct 14 public workshops, one in each of the 14 subregions during the months of October and November 2006 on the integrated growth forecasts and regional housing needs assessment only exemplify the continuing efforts of SCAG to reach all corners of the region.</p>
			<ul style="list-style-type: none"> Per our recent telephone conference call, please address the language (<i>Implementation of each procedure is contingent upon resource and budget availability</i>) associated with the asterisk following the <u>Public Participation Plan Procedures in Obtaining Goals</u> on page eight of the public participation plan. 	<p>The initial intent of this language was to address the extent to which SCAG can implement a particular procedure based upon resource and budget availability. However, we recognize that it could be misconstrued as a means to not implement a specific procedure at all and therefore have removed this copy from the document.</p>
12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>Comment 4 Consultation and Cooperation SAFETEA-LU calls for expanded consultation with federal, state, tribal, wildlife, land management, and other regulatory agencies. To satisfy this gap analysis, the RTP should specifically reference the Environmental Impact Report (EIR) and its role in addressing the RTP requirement for consultation and cooperation. The <i>Requested Actions</i> sections below outlines, in detail, areas needing attention.</p>	
			<p>Requested Action</p> <ul style="list-style-type: none"> If applicable, SCAG should copy into the RTP the section in the EIR it is relying upon to meet the SAFETEA-LU requirement. Document public outreach/involvement and RTP processes using visualization techniques. 	<p>As suggested, the 2008 RTP will directly incorporate elements of the EIR process that address the environmental mitigation requirement of SAFETEA-LU.</p> <p>The 2004 RTP (Appendix H) included an extensive account of the public outreach and participation effort undertaken in connection with preparation of the 2004 RTP. The public outreach efforts are listed in an easy to read format listed by SCAG subregion and also in chronological order. The public outreach appendix also includes an index of public comments and responses for the 2004 RTP in tabular format. As stated in Appendix H of the 2004 RTP, the outreach process included 250 public outreach events, reaching 5,000 participants. In addition, there were ten public workshops, fifteen events targeted at environmental justice audiences, and ten fact sheets about SCAG and the RTP available in English and Spanish.</p> <p>The 2004 RTP Final EIR included a list of persons who commented on the Draft EIR, responses to those comments, and any other relevant information. The Final EIR, prepared pursuant to CEQA Guidelines Section 15132, responded to comments received on the Draft EIR. The 2004 Final EIR included a table of commenting individuals and organizations and full responses to each comment on the Draft EIR.</p>

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12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<ul style="list-style-type: none"> Document public outreach/involvement and RTP processes using visualization techniques. (continued) 	<p>The outreach effort conducted as part of the Administrative Amendment with regard to environmental mitigation was extensive. SCAG held two public workshops in October 2006 to solicit input on the 2004 RTP environmental mitigation measures. The result of the outreach is reflected in the Administrative Amendment and will be included in the next RTP update as applicable.</p> <p>SCAG invited over 300 key contacts to the environmental mitigation workshops held on October 10 and 12, 2006. To initiate consultation with key contacts, SCAG first sent an invitation letter and attached a list of mitigation measures from the 2004 RTP EIR. The contacts included all the planning directors in the region as well as Federal, State, Tribal, land use planning, natural resource, wildlife, environmental protection, historic preservation, conservation, and transportation agencies.</p> <p>SCAG also developed an informative flyer, describing the expanded outreach effort, and distributed it throughout the region. The flyers were distributed to SCAG's Regional Council, Energy and Environment Committee, Transportation and Communications Committee, the Community Economic and Human Development Committee, Plans and Programs Technical Advisory Committee, Open Space Working Group, Energy Working Group, Transportation Conformity Working Group, and Subregional Coordinators. These groups are comprised of elected officials, federal and state agencies, resource agencies, tribal governments, interest groups, and other stakeholders in the region.</p> <p>SCAG personally followed up with approximately 50 key contacts with a phone call and encouraged their participation. This personal outreach included the U.S. Environmental Protection Agency, the Federal Highway Administration, the U.S. Army Corps of Engineers, the U.S.D.A. Forest Service, the National Marine and Fisheries, Caltrans, California Department of Fish and Game, and all tribal chairs.</p> <p>Lastly, SCAG publicized the environmental mitigation workshops online and included information about the workshops in SCAG's E-Vision September newsletter which has a distribution of approximately 1,500. A full list of the contacts and outreach materials can be found in Appendix D of the Administrative Amendment to the 2004 RTP, Expanded Consultation Conducted in October 2006.</p> <p>The environmental mitigation workshops drew 32 participants from various agencies, municipalities, and interest groups. The results of the workshop, including attendee lists are fully documented in Appendix D of the 'Gap Analysis'.</p> <p>Visualization techniques were employed throughout the 2004 RTP and RTP EIR. Both documents are intended for the lay audience. Both documents made extensive use of reader friendly tables, charts and figures. As stated on pages 4 through 5 of the Administrative Amendment, conservation plans and maps as well as inventories of natural or historic resources were considered in the 2004 RTP EIR. The 28 GIS maps from the 2004 RTP EIR which specifically address the RTP's potential impacts on existing natural, historical and cultural resources are provided in Appendix B of the Administrative Amendment.</p>
			<ul style="list-style-type: none"> Please identify how you plan to respond to comments received during the consultation process with the resource agencies on your 2004 RTP? How will those comments be addressed? 	<p>SCAG has prepared a Response to Comments document to address the issues raised during the consultation process with the resource agencies (the environmental mitigation workshops in October 2006). These comments and responses are included in Appendix D of the Administrative Amendment.</p>
			<ul style="list-style-type: none"> SCAG sent out letters for the 2004 cycle and did not get much of a response. What action will be taken to expand the consultation involvement with resource agencies in 2008? What efforts will be made to inform/discuss the RTP with the other agencies? Do you have a record of your outreach attempts with resource agencies? 	<p>The record of consultation efforts for the expanded consultation with resource agencies is contained in Appendix D. The consultation conducted during the 2004 cycle is well documented in Appendix H of the 2004 RTP. SCAG will work with FHWA and FTA staffs to identify further methods to improve the success of the consultation effort.</p>

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12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>Comment 5 Environmental Mitigation Activities Environmental mitigation activities should be addressed for current and future plans. Thus, there could be both short-term changes to the current RTP (if any) and long-term changes to the process for the next RTP. The mitigation workshops are an example of an action taken for the current RTP.</p>	
			<p>Requested Action Please explain the purpose of the workshops, note key findings and if the 2004 RTP was revised based on the workshops. Also, identify what action you will take as a result of these meetings.</p>	<p>No substantive comments have been received on the 2004 RTP mitigation measures, therefore no changes to the current plan's mitigation measures are proposed. All clarifications and expansions of mitigation measures identified will be considered in the development of the 2007/2008 RTP and the identified mitigation measures, along with other measures, will be revised as appropriate.</p> <p>The mitigation measures in the 2004 EIR identified strategies to reduce the negative impacts of population growth, such as traffic congestion and poor air quality. As discussed on page 22 of the Administrative Amendment, the EIR mitigation program listed 195 mitigation measures by resource category and identified a monitoring program to ensure compliance. The mitigation measures were directly linked to the goals, performance outcomes and policies of the 2004 RTP. The 2004 RTP and 2004 RTP EIR share the goals of sustaining mobility, fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations.</p> <p>The purpose of the environmental mitigation workshops was to obtain additional input on the 2004 RTP EIR mitigation measures and to address them in the gap analysis, as feasible. This effort addressed SAFETEA-LU's requirement that, "a long-range transportation plan shall include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan." In addition, this effort addressed the SAFETEA-LU requirement that "the discussion shall be developed in consultation with Federal, State, and tribal wildlife, land management, and regulatory agencies." SCAG intends to continue to improve the RTP mitigation measures and to make them as useful as possible for use in subsequent environmental documents for specific projects.</p> <p>Each workshop began with a presentation by SCAG that discussed both the 2004 RTP and the SAFETEA-LU requirements and the mitigation measures included in the 2004 RTP EIR. The second half of the workshop encouraged discussion and comments from the participants. The discussion questions posed by SCAG included the following:</p> <ul style="list-style-type: none"> • How could the current mitigation measures included in the 2004 RTP EIR be written to be of more assistance to you/your agency when writing Tier 2 documents? • Can you identify additional measures/performance standards that could reduce the number/volume of Tier 2 documents that you prepare? • For trustee and resource agencies, please provide your thoughts on whether there are technical details and/or more specific performance standards that could be reasonably used to help identify and protect important regional resources. <p>The discussion during the workshop on October 10th focused on mitigation to protect open space and critical habitat, mitigation monitoring, and implementation of the mitigation measures. The discussion during the workshop on October 12th focused on how SCAG's efforts could streamline environmental planning. One action resulting from the workshops includes a response to all the comments received as part of the environmental mitigation workshops. This document is included in Appendix D of the Administrative Amendment.</p>

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12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>Requested Action (continued) Please explain the purpose of the workshops, note key findings and if the 2004 RTP was revised based on the workshops. Also, identify what action you will take as a result of these meetings.</p>	<p>SCAG also received four letters in response to the mitigation outreach effort from the City of Rancho Palos Verdes, National Marine Fisheries Service, County of Ventura, U.S. EPA. These letters are included in Appendix D. In general, the letters identified areas where SCAG and the respective agency could work together to ensure greater consistency in mitigation programs. The U.S. EPA also requested more information about SCAG's methodology and implementation strategy. In response to the letter from the U.S. EPA, SCAG held a follow up conference call on November 16, 2006 to explain the mitigation measures in the 2004 RTP EIR and to discuss how SCAG will implement SAFETEA-LU in the next RTP.</p> <p>As SCAG prepares the next RTP, the comments received during the expanded consultation will be incorporated to the maximum extent feasible. Future planning activities, including environmental mitigation discussions, will be developed with the key agencies identified in SAFETEA-LU. Furthermore, as in previous RTP's, the next RTP will include a mitigation program, creating additional linkages between transportation planning and the environment as required by SAFETEA-LU. SCAG will use the input received at the workshops to further assist lead agencies with environmental documents for subsequent projects, or tiered documents. The RTP update will also include a mitigation discussion and utilize documents created by the federal agencies to guide environmental planning for transportation projects.</p> <p>At the same time as the next RTP is being prepared, SCAG is also preparing an update to the RCP, which will feature nine chapters; each based on a specific area of planning or resource management. The resource areas include land use and housing, solid and hazardous waste, energy, air quality, open space and habitat, economy, water, transportation, security and emergency preparedness, and finance. The RCP will be coordinated with the RTP. The RCP will serve as a model for coordinating State, local, and regional planning processes, and for directing innovative regulatory and financial tools for plan implementation. SCAG will also explore ways to protect wildlife corridors, particularly through the Open Space Working Group and the Regional Comprehensive Plan's (RCP) Open Space and Habitat Chapter. More information on SCAG's RCP update is located at http://scag.ca.gov/rcp/.</p>
12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>The term <i>administrative modification</i> as used in the Notice of Proposed Rule Making (June, 2005) applies to Transportation Improvement Program (TIP) documents. It does not apply to policy documents such as the gap analysis. If possible, SCAG should use a different term for this exercise, such as administrative amendment.</p>	<p>The final document will be titled 'Administrative Amendment' as suggested.</p>
12/13/06	Gene Fong Division Administrator	USDOT/FHWA	<p>The RTIP needs to also be addressed, and SCAG staff is awaiting guidance from FHWA. While we anticipate meeting with SCAG staff in January (07), SCAG may want to contemplate the following items for the gap analysis on the RTIP: addition of the 4th year of projects; documentation of expanded consultation and public involvement on the development of the RTIP; have project selection criteria been reviewed to ensure that they reflect safety priorities; and consideration of the Strategic Highway Safety Plan in the development of the RTIP.</p>	<p>The 'Gap Analysis' associated with RTIP is being developed separately. All of these issues will be addressed through this RTIP Gap Analysis.</p>