Letter ID	Agency	Author
08-002	City of Alhambra	Luis Ayala, Mayor
08-003	City of Aliso Viejo	Eugenia Garcia, Planning Director
08-004	City of Aliso Viejo -- Best Best & Krieger LLP	Scott C. Smith
08-006	City of Anaheim	Sheri Vander Dussen, Planning Director
08-009	BNSF Railway Company	Mark P. Stehly
08-011	Building Industry Association of Southern California	Todd Priest
08-012	City of Burbank	David Kriske, Senior Planner
08-013	The California Railroad Industry	Kirk Marckwald
08-016	California Department of Transportation (Caltrans) -- District 7	Lam Nguyen, Interim Deputy District Director
08-017	California Department of Transportation (Caltrans) -- District 12	Ryan Chamberlain, Branch Chief
08-018	Cathedral City	Kathleen J. DeRosa, Mayor
08-021	Center for Demographic Research	Deborah S. Diep, CDR Director
08-023	City of Cerritos	Robert A. Lopez, Advanced Planning/Redevelopment Manager
08-024	City of Chino	Charles E. Coe, Community Development Director
08-025	City of Chino Hills	Douglas N. La Belle, City Manager
08-026	Citizens United to Save South Pasadena	Diana Stoney, Secretary
08-027	The City Project	Robert García, Executive Director and Counsel
08-028	Coachella Valley Association of Governments (CVAG)	-
08-029	City of Costa Mesa	Kimberly Brandt, Assistant Development Services Director
08-030	Culver City	Alan Corlin, Mayor
08-031	City of Cypress	Kori Nevarez, Associate Planner
08-032	City of Cypress	Kori Nevarez, Associate Planner
08-034	City of Diamond Bar	James DeStefano, City Manager
08-035	City of El Segundo -- Shute, Mihaly & Weinberger LLP	Laurel L. Impett, Urban Planner
08-036	Endangered Habitats League (EHL)	Michael D. Fitts, Staff Attorney

February 19, 2008

Southern California Association of Governments
Comments Re: Draft 2008 RTP
Attention: Jessica Meaney
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

The City of Alhambra has reviewed the Draft 2008 RTP. We continue to support the completion of the 710 Freeway between Alhambra and Pasadena. This project when constructed will both reduce congestion and air pollution more than any other proposed project in the entire SCAG five County region. A significant amount of relief is provided as far away as the San Fernando Valley, and with in the 5 freeway corridor. Downtown Los Angeles will receive a significant reduction of both traffic congestion and air pollution.

The completion of the GAP on the 710 route between the 10 and the 210 will complete the freeway network planned and begun in the 60s. The project has been delayed by litigation filed by the opponents of the project. As public officials have noted, these delays have been examples of "ninbi's" and is "shameful," due to the fact that a few have so long harmed the larger population.

The City of Alhambra encourages SCAG to continue to support the completion of the 710 freeway as soon as possible.

Very truly yours,

Luis Ayala
Mayor

MAYOR
WILLIAM PHILLIPS

MAYOR PRO TEM
DONALD A. GARCIA

COUNCIL MEMBERS
CARMEN CAVE, PH.D.
GREG FICKE
PHILLIP B. TSUNODA

CITY MANAGER
MARK A. PULONE

CITY ATTORNEY
SCOTT C. SMITH

February 15, 2008

Attn: Jessica Meaney
Southern California Association of Governments
818 West Seventh St., 12th Floor
Los Angeles, CA 90017

Re: Draft 2008 Regional Transportation Plan

Dear Ms. Meaney:

Thank you for the opportunity to review the Draft 2008 SCAG Regional Transportation Plan and Draft Policy Forecast. Staff has reviewed the document and proposed comments from SCAG staff and submits the following comments on behalf of the City of Aliso Viejo.

SCAG identifies a March 6, 2008 date for the SCAG CEHD policy committee to select and make a recommended growth forecast to SCAG's governing Board, the Regional Council. Also, on April 3, 2008, the Regional Council will take final action on the 2008 Regional Transportation Plan. This action would include:

1. Adoption of the CEHD's recommended growth forecast for the six-county SCAG region.
2. Adoption of the 2008 RTP.
3. Certification of a Final Program EIR.
4. Determination of conformity of the RTP relating to air quality requirements.

After adoption by the Region Council, a two-month review of the 2008 RTP will commence by Caltrans, the Federal Highway Administration, the Federal Transit Administration and the U.S. Environmental Protection Agency, to be completed by June 7, 2008.

The following comments are submitted on behalf of the City:

CITY OF ALISO VIEJO
INCORPORATED JULY 1, 2001

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1. We are in agreement with OCTA that the Orangeline Maglev Project should not be included in the RTP Constrained Plan but should be in the RTP Strategic Plan.
2. The Riverside to Orange County "tunnel" should also not be included in the RTP Constrained Plan but should be in the RTP Strategic Plan; and
3. SCAG should use the local Baseline Projections (from the OC Projections produced by Cal-State Fullerton's Center for Demographic Research) instead of SCAG's Policy Forecast model. SCAG is proposing that within current financial constraints, the goals and benefits beyond year 2015 can be increased by incorporating land use strategies that are more efficient by a redistribution of growth at the county, city and TAZ levels from the baseline.

As has been pointed out by several Orange County cities, in several workshops Orange County cities need assurances that General Plans are considered and upheld in the RTP growth forecasts, including all OCTA transportation projects, and Measure M-funded projects without jeopardizing funding.

Sincerely,

Eugenia Garcia

Eugenia Garcia, AICP
Planning Director

Cc: City Council
Mark Pulone, City Manager
Scott Smith, City Attorney
John Whitman, City Engineer

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February 15, 2008

Attn: Jessica Meaney
Southern California Association of Governments
818 West Seventh St., 12th Floor
Los Angeles, CA 90017

Re: Draft 2008 Regional Transportation Plan

Dear Ms. Meaney:

The City of Aliso Viejo appreciates this opportunity to submit comments on the Southern California Association of Governments' 2008 Draft Regional Transportation Plan ("Draft RTP"). These comments serve two purposes. First, the City invites SCAG's attention to an ill-conceived distribution facility being proposed by the United States Postal Service ("USPS") that appears to be inconsistent with the policies and goals expressed in the Draft RTP. Second, the City suggests that additional policies may be required to address local truck traffic and goods movement within the region. In particular, the RTP should include a policy that directs goods movement and logistics industries that rely on large truck traffic to areas that are within close proximity to regional serving transportation corridors. The City also suggests that proposed dedicated truck lanes be expanded to serve areas beyond the San Pedro Bay Ports to include all regional transportation corridors and be available to all truck traffic. The purpose of these proposed policies is to address the safety and mobility problems, identified in the Draft RTP, which may occur on local streets. Again, the USPS project highlights the need for such additional policy direction in the Draft RTP.

The proposed USPS facility would house equipment that sorts card and letter mail, as well as larger mail, such as business envelopes containing contracts and legal documents, publications, newspapers, magazines, catalogs and prescription medications. Other functions of the facility would include mail loading, unloading and administration. As originally proposed, the facility would have occupied over 417,000 square feet, though the USPS has recently revised its proposal to cover just under 350,000 square feet. The facility would operate 24 hours per day, 7 days per week. The USPS anticipates approximately 74 tractor trailer round trips would serve the facility. The trucks would range in size from 20 to 45 feet long, and 7 to 16.5 tons in weight. Those trucks would utilize SR-73, though some would also travel along

Interstate 5. Trucks traveling on either route would have to traverse several miles of local roadway within the City. The routes are surrounded by residential and commercial areas and traverse hilly terrain. (For additional information regarding the USPS Project, please see the USPS Notice of Hearing posted on the internet at http://ci.aliso-viejo.ca.us/files/aliso viejo_incoming mail_facility_2.9.08.pdf and attachments thereto.)

The proposed Postal Facility appears to be inconsistent with several key policies in the Draft RTP. The Draft RTP and its policies are designed in part to address the region's explosive growth in goods movement and to improve the efficiency and safety of the region's roadways. One of the Draft RTP's strategies for addressing the region's mobility needs is to integrate land use and demand management. (Draft RTP, at p. 85-86.) To that end, the Draft RTP includes the following policies:

- **Continue to protect stable existing single family areas**

  Continue to protect stable existing single family neighborhoods as future growth and a more diverse housing stock are accommodated in infill locations near transit stations, in nodes along corridors and in existing centers. Concurrently, focusing growth in central areas and maintaining less development in outlying areas, preserves the housing option for large-lot single family homes, while reducing the number of long trips and vehicle miles traveled to employment centers.

- **Promote land use patterns supportive of goods movement and logistics industries**

  Promote growth and land use patterns that support regional economic development, namely the goods movement and logistics industries. Plans should focus these new industries apart from existing residential areas, while land use patterns around existing logistics centers should be reconfigured to minimize adverse environmental and health impacts.

(Draft RTP, at p. 88.) Far from protecting existing neighborhoods, the proposed high-truck traffic Postal Facility would be built in the middle of the City's existing low and high-density residential neighborhoods, thereby exacerbating land use and goods movement conflicts. Thus, the USPS facility appears to be inconsistent with the policies in the Draft RTP.

Not only does the proposed Postal Facility threaten land use conflicts with existing residential neighborhoods, but it also illustrates a need for further policy direction in the Draft RTP regarding ways to minimize the adverse impacts of good movement on our communities and our transportation infrastructure. The Draft RTP reports that goods movement causes

adverse impacts associated with trucks, including recurrent delay, pavement deterioration, safety, emissions, and design deficiencies. (Draft RTP, at p. 19.) Truck-related accidents are expected to increase. (Draft RTP, Good Movements Report, at p. 20.) Because nearly one quarter of truck traffic associated with the San Pedro Bay Ports is considered to be local traffic, those impacts will be felt on a local level. (Draft RTP, Good Movements Report, at p. 15.) As noted above, trucks serving the proposed Postal Facility will have to travel several miles on City streets in order to reach SR-73 and I-5, and thus provide a vivid example of the types of impacts that truck-related goods movement will cause.

Additional policy direction in the Draft RTP could help alleviate some of these concerns. First, the City suggests that the Draft RTP include a policy that directs truck-intensive goods movement and logistics industries to areas that are located near entrances and exits to regional serving transportation corridors. Second, the Draft RTP's proposal for dedicated lanes for clean technology trucks should be expanded to include all truck traffic, and not just clean technology trucks. (Draft RTP, at p. 118.) Further, those lanes should be included on all regional transportation corridors, and not just those between the Ports and the SR-60 interchange. Further, SCAG should work with state and federal partners to ensure that heavy truck traffic associated with the logistics and good movement industries be directed to those dedicated lanes. The proposed Postal Facility illustrates precisely why such additional policy direction is needed in the Draft RTP.

The City is happy to work with SCAG to develop the policies suggested above, or to provide additional information regarding the proposed USPS Postal Facility.

Sincerely,

Scott C. Smith
of BEST BEST & KRIEGER LLP

SCS:chc

cc: City Council
Mark Pulone, City Manager

RVPUB\CCALFEE\48828.1

February 15, 2008

Honorable Gary Ovitt
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

RE: DRAFT 2008 REGIONAL TRANSPORTATION PLAN, DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT, AND DRAFT GROWTH FORECASTS

Dear Mr. Ovitt:

Thank you for the opportunity to review and comment on the above-referenced documents. City of Anaheim staff offers the following comments:

Growth Forecast Comments:

Upon review of the Policy and Envision Growth Forecasts, staff has identified significant inconsistencies between these projections and the local input that the City of Anaheim ("City") has previously provided to SCAG. This local input is accurately reflected in the OCP-2006 and incorporated into the Baseline Growth Forecast. As described in detail in Attachment 1, the land uses and distribution of growth for the City that are reflected in the Policy and Envision Growth Forecasts vary greatly from the OCP-2006 and are unlikely to occur.

The OCP-2006 was developed through a "bottom-up" process that involved substantial input from all local governments in Orange County, including Anaheim. It represents the most likely growth projection for the County and accurately reflects growth opportunity areas and growth influencing factors such as sensitive habitat areas, flight path-restricted development zones, and approved development agreements. Staff believes that the OCP-2006 also represents a growth forecast consistent with the growth principles outlined in the RTP.

Generally, the inconsistencies between the OCP-2006 and the Policy Growth Forecast are as follows:

1. The Policy and Envision Growth Forecasts significantly differ from local input and the City's General Plan. Most notably, these forecasts are inconsistent with the growth anticipated for the City's Downtown, Platinum Triangle, and Anaheim Resort areas.

2. The Policy and Envision Growth Forecasts were developed following minimal consultation with local jurisdictions. The projected land uses and development intensities were finalized prior to review by local governments, resulting in land use assumptions that are in direct conflict with the growth distribution planned by the City.

3. The benefits of the Policy Growth Forecast, as identified in the RTP and the PEIR, are minimal with respect to Orange County while the impacts to the County's arterial highway speeds, which are reduced by this forecast, may be substantial.

Given that the Regional Transportation Plan establishes numerous regional policies that local agencies must address in their project and environmental reviews, staff cannot support or accept the distribution of growth included in the Policy and Envision Growth Forecasts. We, therefore, request that SCAG use the 2006 Orange County Projection (OCP-2006) as the growth forecast in adopted in the RTP for the Orange County sub-region and as the basis for all associated environmental and air quality determinations. Please consider these comments applicable to both the RTP and the PEIR.

Regional Transportation Plan ("RTP") Comments:

1. Pages 47 through 62 of the RTP offer an extensive description of the future growth anticipated in the region based on the Policy Growth Forecast. The interrelationship between growth (population, housing, and employment) and the transportation system is fully recognized; however, the forecast used in the RTP must acknowledge the realities of land use planning and take into consideration various constraints on growth and intensification of uses based on infrastructure capacities and environmental concerns. As discussed in the previous section, upon review of the Policy Growth Forecast, staff has identified numerous significant inconsistencies between the forecast and the City's adopted General Plan and other planning documents and programs. These inconsistencies render the Policy Growth Forecast unreasonable, unrealistic and inconsistent with planned local transportation infrastructure. This situation is in direct conflict with the wording contained on Page 86 of the document which states that the forecast adopted as part of the RTP must be reasonable, realistic and consistent with the planned transportation infrastructure. Because the data in the OCP-2006 represents the most likely future growth pattern in the City and Orange County, staff requests that the OCP-2006, developed cooperatively amongst all Orange County jurisdictions, represent the preferred growth projection used as the basis for the RTP.

2. Page 62 refers to the growth identified in the Baseline Forecast, which incorporates the OCP-2006, as "supporting urban sprawl" and representing a growth scenario that is:

> *"…very similar to the status quo, taking a somewhat "business as usual" approach that is not steered by regional policies. Thus, for example, fast-growing suburban cities would likely continue to grow primarily through auto-oriented single family housing with commercial activities focused toward the*

highway system. The baseline growth distributions would result in severe traffic congestion and vehicle emission. The baseline land use could be tempered, and in some cases bolstered, by policies and programs designed to improve future travel patterns and vehicle emissions."

The statement does not recognize that significant land use changes have taken place in Anaheim and much of Orange County. It also does not recognize the fact that the majority of growth in Orange County and in the City will consist of higher density, infill development. For example, the City's 2004 General Plan update and subsequent Platinum Triangle Master

Land Use Plan resulted in the redesignation of hundreds of acres of land for high density residential and mixed-use development while largely utilizing existing infrastructure and focusing on access to transit. As such, the above listed statements should be deleted from the document or changed to reflect that many regions and cities have changed their local general plans and are practicing growth principles consistent with those identified in the RTP.

3. The City of Anaheim has partnered with the Orange County Transportation Authority (OCTA) to study new transit connections between major employment and activity centers in the City and its two Metrolink station facilities as part of OCTA's Go Local Program. The City's initiative is consistent with OCTA's Project S (High Capacity Transit Extensions to Metrolink), which earmarked up to $1 billion as part of Orange County's voter approved Renewed Measure M half-cent sales tax program. In December 2007, the Anaheim City Council adopted a Transit Master Plan which identified a number of new high-capacity transit systems in the City. Among those systems contemplated in the Plan is a proposed 3.4-mile elevated fixed-guideway system that would connect the Anaheim Regional Transportation Intermodal Center (ARTIC), The Platinum Triangle, and the Anaheim Resort. This system is anticipated to begin revenue operations by year 2015. The City anticipates conducting a federally defined Alternatives Analysis/Environmental Document/Preliminary Engineering as part of the next phase in Summer 2008. Therefore, the City requests that the proposed elevated fixed-guideway system be added to Table 3.5 Transit Corridor Projects on Page 108.

4. The City also requests that the planned ARTIC facility be added to Table 3.5 Transit Corridor Projects on Page 108. Located adjacent to the Orange (SR-57) Freeway in the Platinum Triangle area, ARTIC will be a gateway station connecting Metrolink commuter rail service, Amtrak, BRT, fixed-route bus service, an elevated fixed-guideway system connecting with the Anaheim Resort. The City is partnering with OCTA to solicit a private partner to help build, finance and maintain ARTIC. The facility is planned to build upon OCTA's Metrolink Expansion and Bus Rapid Transit (BRT) programs and is envisioned to become the transportation hub of Orange County. ARTIC will offer direct baggage check-in and express service to local airports, and potentially high-speed train service connecting Orange County to other regions within California and beyond. Moreover, ARTIC is planned to be integrated into a mixed-use development in a manner consistent with SCAG's Compass Blueprint Implementation Strategy of focusing high density development and growth around

major transportation corridors and centers. ARTIC is also consistent with OCTA's Project T (Convert Metrolink Station(s) to Regional Gateways that Connect Orange County with High Speed Rail Systems) and up to $226.6 million has been allocated as part of the Renewed Measure M. The interim phase of ARTIC is expected to be build by 2015 with full build-out expected by 2030.

Draft Program Environmental Impact Report Comments:

The Policy Growth Principles outlined in the RTP are specifically identified as voluntary for local governments. As such, the mitigation measures in the PEIR directly mitigating the growth that would result from the Policy Growth Principles (as depicted in the Policy Growth Forecast) should also be considered voluntary in nature and should apply only if the measure is practical and feasible for the implementing agency. Further, the growth scenario preferred by Anaheim and embodied in the OCP-2006 and Baseline Forecast of the RTP, is or will be mitigated through existing or future mitigation programs. Attachment 2 contains specific comments and recommendations regarding the mitigation measures included in the PEIR.

We would again like to thank you for the opportunity to comment on these items. Please forward any subsequent public notices and/or environmental documents regarding the projects discussed in the Regional Transportation Plan and/or Program Environmental Impact Report to Tracy Sato, AICP, Senior Planner at the address listed at the bottom of the first page of this letter. If you have any questions regarding these comments, please do not hesitate to contact me at (714) 765-5010.

Sincerely,

Sheri Vander Dussen, AICP
Planning Director

svd:ts:sr
Enclosures 2
By e-mail
cc: Hasan Ikhrata, Southern California Association of Governments
Ryan Kuo, Southern California Association of Governments
Jessica Meaney, Southern California Association of Governments
Jessica Kirchner, Southern California Association of Governments
Frank Wen, Southern California Association of Governments
Dennis Wilberg, Orange County Council of Government
Natalie Meeks, City of Anaheim Public Works Department
Marty DeSollar, City of Anaheim External Affairs/PIO
Danny Wu, City of Anaheim Public Works Department

Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)

Overall Comments:

1. The City of Anaheim has actively participated in the development of the OCP-2006 and believes that it is the growth forecast that most accurately reflects the land uses anticipated in the City. The City, therefore, requests that any growth forecast adopted as part of the 2008 Regional Transportation Plan be fully consistent with the OCP-2006.

2. Specific comments are only provided for Census Tracts that had differences of greater than 100 residential units or employment totals when comparing the Policy Growth Forecast and the OCP-2006. However, nearly all Census Tracts in the City indicated differences between the two forecasts. Through preparation of the OCP-2006, staff anticipated and projected increases and decreases in both housing units and employment in Census Tracts throughout the City. These figures were based on local knowledge of pending development plans and available development sites. The majority of development projected within Anaheim is expected to occur on sites that are currently developed with other uses. The alternative Policy Growth Forecast is not representative of this anticipated growth.

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
116.02	359	-235	The majority of this census tract is within the City of Fullerton. For the portion within Anaheim, the existing industrial and commercial areas are not anticipated to convert to residential uses. Further, the City has no reason to anticipate that there will be any reduction in the employment projected.
117.22	-1,222	58	The majority of these census tracts are in the City of Placentia. The area within Anaheim is fully developed with stable, single-family neighborhoods with some commercial uses. No land uses changes are anticipated in this area.
218.21	-217	-68	
219.24	-640	-27	Only a portion of this tract is within Anaheim. This portion is planned to develop per an approved specific plan and development agreement with the landowner, The Irvine Company. Plans for the development, known as Mountain Park, include 2,500 residential units. The City does not anticipate any reduction in the number of units planned for this area.

Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
117.14	112	-5,649	This census tract is located in the Canyon business area of the City. A small portion is located in the City of Placentia. The intensification of currently developed sites is occurring and further anticipated in this area. This will result in a significant increase in employment. Two on-going re-use projects are of particular note. The first is the redevelopment of a previously underutilized industrial site to a new, 360-bed, regional Kaiser Permanente hospital and medical center. This project is under construction. The second site is currently occupied by Boeing, who in the past decade had significantly reduced their workforce at the location. However, the site recently sold to a developer who intends to redevelop the site with an office and research park. These new uses are expected to be fully occupied in the future resulting in a net gain in employment. While there is potential for additional residential development, it is unlikely to occur to the extent identified. The majority of this area is already developed with industrial uses and a small amount of commercial and office that are anticipated to remain in place. Residential development was anticipated in the OCP-2006 at appropriate locations. Additional residential development, while possible, is not currently anticipated to exceed what was anticipated by staff. The Policy Growth Forecast is in direct conflict with the City's land use assumptions for this area.
758.13	75	1,335	Only two portions of this tract are within Anaheim. The portion within the City is developed with stable, single-family residential neighborhoods and a water tower. It is unlikely that these uses will change. The City of Anaheim does not anticipate any additional employment or housing in this area.
761.02	-640	-974	Only a portion of this census tract is within Anaheim. The portion within the City is currently developed with institutional and residential uses. One planned project is anticipated to increase the overall number of residential units in the area by 450. This reuse does not appear to have been incorporated in the Policy Growth Forecast. The City does not anticipate a change in employment.

Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
761.01 and 863.03	-1,124 -1,186	5,351 4,776	These two tracts encompass an area of the City referred to as the Platinum Triangle. Other portions of the tracts also extend into the City of Orange (tract 761.01) and into another area of Anaheim (tract 863.03). The areas outside of the Platinum Triangle, but still within the City, are currently developed with stable, residential and industrial uses that are not anticipated to significantly change. The area within the Platinum Triangle is currently undergoing significant transformation from a largely industrial area into a new residential mixed-use and office district. While a recently approved amendment to the Platinum Triangle Land Use Plan could accommodate additional employment, the City does not anticipate any decreases in the amount of housing identified in the OCP-2006. In fact, there are currently more residential units under construction or entitled under development agreements than indicated in the Policy Growth Forecast. At this time, the City requests that the OCP-2006 be used as the forecast in the 2008 RTP.
864.06	-672	2	The area encompassed by this census tract contains a variety of residential and commercial uses. While the single-family neighborhoods are stable and not anticipated to change, there is the potential for some commercial sites to convert to residential uses. These potential changes in use were anticipated to result in an increase of 704 residential units, as reflected in the OCP 2006. This reuse does not appear to have been incorporated in the Policy Growth Forecast.
865.01	176	139	The area encompassed by this census tract contains a variety of residential, commercial, office and industrial uses. Several sites are anticipated to redevelop by 2035. While there is potential for the redevelopment of this area to include increases in both the residential units and employment, the redevelopment is most accurately reflected in the OCP-2006. The increases in both housing units and employment shown in the Policy Growth Forecast are not consistent with the development currently anticipated in this area.
866.01	502	487	The area encompassed by this census tract is currently a mix of higher density and stable, single-family residential neighborhoods with some strip commercial and existing medical facilities. While some reuse of existing sites is possible, the City does not anticipate significant changes in the land use. The increases in both housing units and employment shown in the Policy Growth Forecast are not consistent with the development currently anticipated in this area.

Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
866.02	90	239	The area encompassed by this census tract is currently a mix of existing stable, single-family neighborhoods, higher density residential, and fully occupied regional and general commercial uses. Additional residential and employment development indicated by the Policy Growth Forecast is not anticipated.
867.01	-237	-234	The area encompassed by this census tract is currently a mix of higher density and stable, single-family residential neighborhoods and some strip commercial uses. A vacated hospital site is anticipated to be redeveloped with residential mixed-use development. This reuse was reflected in the OCP-2006. The decreases in residential and employment growth shown in the Policy Growth Forecast are not consistent with the probable development of the site.
867.02	-477	0	The area encompassed by this census tract is a mix of existing stable, single-family neighborhoods, higher density residential, and general commercial uses. The conversion of some of the commercial sites to residential mixed use is anticipated in the future. This reuse was reflected in the OCP-2006. The decrease in residential growth shown in the Policy Growth Forecast is not consistent with the probable development of these sites.
868.01	93	-1,215	Only a portion of this census tract is within Anaheim. The area within the City is currently developed with underutilized industrial uses and a stable, single-family neighborhood. It is anticipated that the industrial area will redevelop with a mix of office and industrial uses. It is anticipated that the reuse of the site will result in a significant increase in employment. The decreases in residential and employment growth shown in the Policy Growth Forecast are not consistent with the probable development of the site.
868.02	-99	359	The area encompassed by this census tract contains existing commercial and industrial uses. There is the potential for some areas to convert from their existing uses to residential uses, as is reflected in the OCP-2006. The decrease in residential units and increase in employment in this area shown in the Policy Growth Forecast is not consistent with these anticipated changes in use.
868.03	554	-10	The area encompassed by this census tract consists of stable, single-family neighborhoods, higher density residential, and both regional and general commercial uses. The City is anticipating the conversion of some existing strip commercial to residential development as reflected in the OCP-2006. The city does not anticipate the changes in land use that would accommodate the significant increase in housing units as shown in the Policy Growth Forecast.

Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
869.02, 869.03, 870.01, 871.02 And 871.05	-335 -542 -463 -1,049 -1,414	203 162 0 591 584	The areas encompassed by these census tracts are fully developed and consist of a mix of stable, single-family neighborhoods, higher density residential, and commercial and industrial uses. The overall area is currently undergoing significant reuse of underutilized sites, as was reflected in the OCP-2006. Residential infill projects are being built on several underutilized strip commercial and industrial sites, resulting in the increases in residential units and decreases in employment. The conversion of these sites from commercial and employment uses to residential uses is not reflected in the Policy Growth Forecast.
871.06	129	65	The area encompassed by this census tract consists of existing higher density residential and visitor-serving commercial uses (hotels and restaurants). While the additional employment shown in the Policy Growth Forecast is possible, no additional residential development is anticipated in this area.
872.00 and 873.00	305 -11	187 230	The areas encompassed by these census tracts are within the Downtown and Colony Historic District areas of the City. These areas are currently developed with existing, stable-single family residential neighborhoods and some higher density residential and strip commercial uses. Significant office and commercial uses also exist Downtown. The conversion of existing underutilized sites to residential mixed use, much of which is already under construction, was incorporated in the OCP-2006. The increases in employment and overall increase in the number of housing units identified in the Policy Growth Forecast is not consistent with the redevelopment anticipated by the City.
874.01, 874.03, 874.04 and 874.05	-129 -257 115 214	57 1,126 70 265	The areas encompassed by these census tracts are currently undergoing significant redevelopment and land use change. While much of the area consists of stable, single-family neighborhoods, several sites include underutilized industrial and commercial uses. The redevelopment of these underutilized sites, as anticipated by the City and incorporated into the OCP 2006, was carefully considered on a site specific basis. The Policy Growth Forecast, which alternatively increases and decreases residential units and significantly increases employment, is inconsistent with both the existing development as well as the new uses anticipated in the area.

Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
875.01 and 875.03	1,740 1,485	-652 -17	The majority of the area encompassed by these census tracts is within Anaheim with a small portion in the City of Garden Grove. The area is currently developed with two theme parks (Disneyland and California Adventure); the Anaheim Convention Center; visitor-serving commercial uses that include hotels, restaurants, and other entertainment venues; and along the west side of the area, stable, single-family and high density residential uses. Much of the area is located within the boundaries of the Anaheim Resort Specific Plan area. The significant increase in housing units and decrease in employment identified in the Policy Growth Forecast are not anticipated for this area. While a few specific sites could accommodate some additional residential development, these sites are not expected to develop with residential uses within the Forecast's timeframe nor could they develop at the intensities projected in the Forecast due to the limited infrastructure capacity.
876.02	153	37	The area encompassed by this census tract consists of stable, single-family neighborhoods, higher density residential, and general commercial uses. The City does not anticipate the increase in housing units included in the Policy Growth Forecast.
877.03	792	594	Areas of this census tract are within Anaheim, the County of Orange (unincorporated), and the City of Garden Grove. However, the unincorporated area is within Anaheim's sphere of influence. The area is developed with stable, single-family residential neighborhoods and some general commercial uses. While the conversion of some of the commercial uses is not unreasonable, the significant increases in both the number of residential units and employment could not be accommodated without redeveloping the existing single-family residential neighborhoods. The City does not anticipate the changes in land use that would be necessary to accommodate the increase in housing units included in the Policy Growth Forecast.
877.04	-199	182	The area encompassed by this census tract is developed with stable, single-family neighborhoods, some underutilized strip commercial and some higher density residential uses. Some conversion underutilized commercial sites to residential uses is anticipated in the future and is reflected in the OCP-2006. However, the conversion of these sites from commercial and employment-generating uses to residential uses is not reflected in the Policy Growth Forecast.

Attachment 1: Comments Regarding Differences between the Policy Growth Forecast and the Orange County Projection of 2006 (OCP-2006)

2000 Census Tract	Difference in Year 2035 (Policy – OCP-2006)		Comments
	Households	Employment	
878.02, 878.03, 878.05 And 878.06	577 5 280 570	1,875 449 345 896	The majority of these census tracts are located within the City of Stanton with only minimal areas in Anaheim. For those areas within Anaheim, the existing uses are comprised primarily of higher density residential and commercial with some stable, single-family neighborhoods. Reuse of several commercial sites for residential and mixed-use residential is anticipated in the future and is reflected in the OCP-2006. Only minor increases in employment are anticipated. The significant increases in both housing units and employment shown in the Policy Growth Forecast are not expected within Anaheim.
884.02	1,204	2,792	The majority of the area of this census tract is within the City of Garden Grove. The small portion within Anaheim is located within the Anaheim Resort. The area is largely developed with visitor-serving commercial uses. There is the potential for a small amount of residential development, however, at this time it is not anticipated to occur within the time frame of the Policy Growth Forecast. The City also does not anticipate the significant increases in employment anticipated in the Forecast.
1104.01 and 1104.02	707 -47	1,090 -204	Only a very small portion of the area is within Anaheim. Increases to the number of housing units and employment are not anticipated.

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Overall comments on the mitigation measures:

1. Please clarify and define the entity or entities that would be responsible for each mitigation measure. Several of the measures include entities that do not have authority to implement the measure.
2. Please use consistent language to identify responsible entities. It appears that the term "Project sponsor" and "Project Implementation Agency," among other terms are used interchangeably but not consistently in the mitigation measures.

Mitigation Measure	**Comments and Recommendations**
Energy	
MM-EN.15: Local agencies should streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.	It is unclear which local agencies would be required to implement this measure. The term "local agencies" should be clearly defined and be used consistently throughout the document and in the mitigation measures. Recommended language: *MM-EN.15: Local ~~agencies~~* ***governments*** *should****, as practical and feasible,*** *streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.*
MM-EN.16: Local agencies should adopt a "Green Building Program" to promote green building standards. Green buildings can reduce local environmental impacts, regional air pollutant emissions and global greenhouse gas emissions. Green building standards involve everything from energy efficiency, usage of renewable resources and reduced waste generation and water usage. For example, water-related energy use consumes 19 percent of the state's electricity. The residential sector accounts for 48 percent of both the electricity and natural gas consumption associated with urban water use. While interest in green buildings has been growing for some time, cost has been a main consideration as it may cost more up front to provide energy-efficient building components and systems. Initial costs can be a hurdle even when the installed systems will save money over the life of the building. Energy efficiency measures can reduce initial costs, for example, by reducing the need for over-sized air conditioners to keep buildings comfortable. Undertaking a more comprehensive design approach to building sustainability can also save initial costs through reuse of building materials and other means.	All text beyond the first sentence of the mitigation measure is narrative and should be included in the body of the PEIR. It is unnecessary to include it in the measure. The following language is requested: *MM-EN.16: Local ~~agencies~~* ***governments*** *should ~~adopt~~* ***develop*** *a "Green Building Program" to promote green building standards.*

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
A comprehensive study of the value of green building savings is the 2003 report to California's Sustainable Building Task Force. In the words of the report: "While the environmental and human health benefits of green building have been widely recognized, this comprehensive report confirms that minimal increases in upfront costs of about 2% to support green design would, on average, result in life cycle savings of 20% of total construction costs -- more than ten times the initial investment. For example, an initial upfront investment of up to $100,000 to incorporate green building features into a $5 million project would result in a savings of $1 million in today's dollars over the life of the building."	This is a statement and not a mitigation measure. It should be moved into the body of the PEIR and removed from the mitigation monitoring program.
MM-EN.17: Local governments should alter zoning to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel. Creating walkable, transit oriented nodes would generally reduce energy use and greenhouse gas emissions. Residential energy use (electricity and natural gas) accounts for 14 percent of California's greenhouse gas emissions. It is estimated that households in transit-oriented developments drive 45 percent less than residents in auto-dependent neighborhoods. In addition, mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year. Furthermore, studies have shown that the type of housing (such as multi-family) and the size of a house have strong relationships to residential energy use. Residents of single family detached housing consume over 20 percent more primary energy than those of multifamily housing and 9 percent more than those of single-family attached housing.	Because all of the text following the first sentence is descriptive, it should be moved to the body of the PEIR. It is not necessary to include it in the mitigation monitoring program. The following is requested language for the mitigation measure: *MM-EN.17: Local governments should ~~alter zoning~~ ~~to improve~~* ***consider*** *jobs/housing* balance***, to the extent practical and feasible,*** *and* ***encourage the development of*** *~~creating~~ communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.*
MM-EN.23: Project sponsors should consider the most cost-effective alternative and renewable energy generation facilities.	Please clarify under what circumstances project sponsors should be considering these facilities.

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
MM-EN.24: Project sponsors should ensure that new buildings incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	Not all project sponsors, such as county transportation commissions, have the ability or means to do this. Please clarify who would be responsible for this and to what types of projects this would apply. Also, please add the following text: *MM-EN.24: Project sponsors should ~~ensure~~ ~~that~~ **encourage, to the extent practical and feasible,** new buildings to incorporate solar panels in roofing and ~~tap~~ **utilize** other renewable energy sources to offset new demand on conventional power sources.*
MM-EN.25: Project sponsors should require energy efficient design for buildings. This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.	The following language is requested: *MM-EN.25: Project sponsors should ~~require~~ **encourage,** energy efficient design for buildings. ~~This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.~~*
MM-EN.26: Project sponsors should fund and schedule energy efficiency "tune-ups" of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)	This measure should be directed towards utility agencies. However, SCAG does not have the authority through the RTP to direct the actions of utility agencies. As such, this measure should be deleted as it cannot be implemented and therefore would not result in any measurable mitigation of the impact. Further, should this measure not be removed from the PEIR, please note that not all project sponsors, such as county transportation commissions, have the ability or tools to do this. Please clarify who would be responsible for this and on what projects it would apply. The following language is offered for clarification: *MM-EN.26: ~~Project sponsors~~ **Local governments** should ~~fund and schedule~~ **encourage** energy efficiency "tune-ups" of existing buildings. ~~by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)~~*
MM-EN.27: Project sponsors should provide individualized energy management services for large energy users.	This type of action does not fall under the purview of SCAG, transportation agencies, or local governments. This would need to be a requirement of local electric utility providers. As such, this measure should be deleted.

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
MM-EN.28: Project sponsors should require the use of energy efficient appliances and office equipment.	Please clarify what is meant by "project sponsors." Additionally, the following clarifications are requested: *MM-EN.28: Project sponsors should ~~require~~ **encourage** the–use of energy efficient appliances and office equipment.*
MM-EN.32: Project sponsors should incorporate on-site renewable energy production (through, e.g., participation in the California Energy Commission's New Solar Homes Partnership). Require project proponents to install solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.	This measure should specify the types of projects it applies to. All development and redevelopment projects are currently subject to Title 24 requirements for energy efficiency. The following clarification is requested: *MM-EN.32: Project sponsors should incorporate**, where practical and feasible,** on-site renewable energy production ~~(through, e.g., participation in the California Energy Commission's New Solar Homes Partnership). Require project proponents to~~ **such as the** install**ation of** solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.*
MM-EN.34: Project sponsors should provide public education and publicity about energy efficiency programs and incentives.	Not all project sponsors, such as county transportation commissions, have the ability or tools to do this. The following clarifications are offered: *MM-EN.34: ~~Project sponsors~~ **Local governments** should provide public education and publicity about energy efficiency programs and incentives **in cooperation with local utility providers**.*

Mitigation Measure	**Comments and Recommendations**
MM-EN.35: In some instances, a project sponsor may find that measures that will directly reduce a project's greenhouse gas emissions are insufficient. A lead agency may consider whether carbon offsets would be appropriate. The project proponent could, for example, fund off-site projects (e.g., alternative energy projects) that will reduce carbon emissions, or could purchase "credits" from another entity that will fund such projects. The lead agency should ensure that any mitigation taking the form of carbon offsets is specifically identified and that such mitigation will in fact occur.	Implementation of this measure would require that a "carbon trading" system be established in the region or state. Additionally, much of the text in this measure is narrative and can be deleted. The following clarification is offered: *MM-EN.35: ~~In some instances, a project sponsor may find that measures that will directly reduce a project's greenhouse gas emissions are insufficient.~~* ***If a regional carbon trading system is established, a*** *~~A~~ lead agency may consider whether carbon offsets would be* ***an*** *appropriate* ***means of project mitigation****. ~~The project proponent could, for example, fund off-site projects (e.g., alternative energy projects) that will reduce carbon emissions, or could purchase "credits" from another entity that will fund such projects. The lead agency should ensure that any mitigation taking the form of carbon offsets is specifically identified and that such mitigation will in fact occur.~~*

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
MM-EN.36: Project sponsors should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure • Land use and planning strategies to increase biking and walking trips	Land use strategies such as those indicated are the responsibility of local governments and not the responsibility of all project sponsors, such as county transportation commissions. Please remove the language relating to "Project sponsors" from the mitigation measure as it does not apply to all project sponsors. Additionally, it is not currently possible to fully "eliminate pollution." However, local governments could encourage the minimization of pollution to the extent practical and feasible. The following is offered for clarification: *MM-EN.36: ~~Project sponsors should incorporate and l~~**L**ocal governments should ~~include~~ **consider** the following land use principles that use resources efficiently, **and to the extent practical and feasible** ~~eliminate~~ **minimize** pollution and ~~significantly~~ reduce waste **generation:** ~~into their projects, zoning codes and other implementation mechanisms~~* *• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure* *• Land use and planning strategies to increase biking and walking trips*
MM-EN.37: Project sponsors and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:	Land use strategies are the responsibility of local governments. Please remove the language relating to "Project sponsors" from the mitigation measure as it does not apply to all project sponsors. Additionally, the following clarifications are offered: *MM-EN.37: ~~Project sponsors and l~~**o**~~cal~~ **Local** governments should **encourage the integration of** ~~integrate~~ green building measures into project design ~~and zoning~~ such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures ~~that should be explored~~ for new and remodeled buildings **could** include **the following examples:….***

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
Land Use	
MM-LU.11: Local governments should adopt and implement General Plan Housing Elements that accommodate the housing need identified through the RHNA process. Affordable housing should be provided consistent with the RHNA income category distribution adopted for each jurisdiction.	This measure is not necessary as it duplicates the mitigation stated in MM-LU.10. As such, we request that it be deleted.
MM-LU.13: Local governments and subregional organizations should develop ordinance and other programs which will enable and assist in the cleanup and redevelopment of brownfield sites.	Subregional organizations do not have the authority to develop ordinances. The following language is offered for clarification: *MM-LU.13: Local governments and subregional organizations should ~~develop ordinances and other programs which will enable and assist in~~ **encourage** the cleanup and redevelopment of brownfield sites.*
MM-LU.14: Local governments and subregional organizations should develop adaptive reuse ordinances and other programs that will enable the conversion of vacant or aging commercial, office and some industrial properties to housing and mixed-use housing.	Subregional organizations do not have the authority to develop ordinances. Additionally, local governments should determine the best use of such sites based on conditions and constraints present. Not all underutilized sites are appropriate for residential uses. The following language is offered for clarification: *MM-LU.14: **Where practical and feasible, l**ocal governments ~~and subregional organizations~~ should develop ~~adaptive reuse ordinances and other~~ programs ~~that will~~ **to** enable the **reuse of** ~~conversion of vacant or aging~~ **underutilized** commercial, office and/or industrial properties **for housing or mixed use** housing. ~~housing and mixed-use housing~~.*
Open Space	
MM-OS.23: Project sponsors should ensure that at least one acre of unprotected open space is permanently conserved for each acre of open space developed as a result of growth that accompanies transportation projects/improvements.	This measure appears to duplicate measure MM-OS.15, which requires the mitigation of impacts that transportation projects may have on open space. Moreover, growth induced by transportation projects is impossible to accurately quantify. CEQA requires that mitigation measures included in a PEIR be possible to implement and to be quantifiable. This measure is neither. Since other mitigation measures appear to adequately address open space impacts, it is requested that this measure be deleted.

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
The Mitigation measures listed above for impacts 3.10-1 through 3.10-3 shall be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.	Please further clarify what is meant by Tier 2 projects and how and when these measures would be applied. Would these be offered as suggested mitigation measures by SCAG when it reviews CEQA documents through the existing intergovernmental review process? Additionally, the following changes are requested: *The ~~Mitigation~~ **mitigation** measures listed above for impacts 3.10-1 through 3.10-3 ~~shall~~ **would** be applied to Tier 2 projects (General and Specific plans and individual development projects) in the region. In addition to these measures, the following mitigation measures would be applied to Tier 2 and 3 projects (General and Specific plans and individual development projects) in the SCAG Region.*
MM-OS.34: Project level mitigation for significant cumulative and growth inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG.	At this time, SCAG does not have the authority to facilitate compacts or agreements regarding open space. Such language should be removed from the measure. The following changes are requested: *MM-OS.34: Project level mitigation for significant cumulative and growth inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region ~~or through multi-party conservation compacts facilitated by SCAG~~.*

Mitigation Measure	Comments and Recommendations
MM-OS.35: Local governments should establish transfer of development rights (TDR) programs to direct growth to less agriculturally valuable lands (while considering the potential effects at the sites receiving the transfer) and ensure the continued protection of the most agriculturally valuable land within each county through the purchase of the development rights for these lands. Local governments should also consider the following: • Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land. • Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food. • Considering partnering with school districts to develop farm-to-school programs.	Transfer of development rights programs are complex and costly to implement. While they are a valuable tool for the preservation of open space, they are not the only tool available, as indicated by the list of options in the measure. The following changes are requested: *MM-OS.35: Local governments should establish* ***programs to*** *~~transfer of development rights (TDR) programs to~~ direct growth to less agriculturally valuable lands ~~(while considering the potential effects at the sites receiving the transfer)~~ and ensure****, where possible,*** *~~the continued~~ protection of the most agriculturally valuable land within each county ~~through the purchase of the development rights for these lands~~. ~~Local governments should also consider the~~* ***The*** *following* ***are offered as examples of programs****:* • ***The development or participation in transfer of development rights programs to encourage the preservation of agricultural lands*** • *Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.* • *Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food.* • *Considering partnering with school districts to develop farm-to-school programs.*

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
MM-OS.41: Project sponsors and local governments should increase the accessibility to natural areas lands for outdoor recreation.	This measure does not appear to mitigate the impact under which it is listed. Additionally, implementation of this measure could result in unintended impacts on natural areas, such as increased pollution or damage to sensitive habitat areas. Finally, some project sponsors will not have the ability to increase accessibility to natural areas. As such, it is requested that this measure be deleted. However, if the measure is not deleted, we agree that project sponsors should consider accessibility to natural areas in their construction projects. The following changes are requested: *MM-OS.41: **Where practical and feasible, p**roject sponsors **should consider** and local governments should increase**,** the accessibility to natural areas **and** lands for outdoor recreation. Such measures should be coordinated **with local and regional open space planning or management agencies**.*
MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to revitalize existing communities.	It is not clear how this will mitigate the impact. The following is offered as clarification: *MM-OS.42: Project sponsors and local governments should promote infill development and redevelopment to ~~revitalize existing communities~~ **encourage the efficient use of land and minimize the development of agricultural and open space lands.***

Mitigation Measure	**Comments and Recommendations**
MM-OS.43: Project sponsors should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	It is not clear how this measure mitigates the stated impacts and this measure duplicates MM-EN.36. As such, it is requested that the measure be deleted. However, if the measure is not deleted, the same comments as provided on MM-EN.36 apply. Specifically, the following clarification is requested: *~~Project sponsors should incorporate and l~~**L**ocal governments should ~~include~~ **consider** the following land use principles that use resources efficiently, **and to the extent practical and feasible** ~~eliminate~~ **minimize** pollution and ~~significantly~~ reduce waste **generation:** ~~into their projects, zoning codes and other implementation mechanisms:~~* *• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure* *• Land use and planning strategies to increase biking and walking trips*
MM-OS.45: Project sponsors and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	This measure is most applicable to local governments as many project sponsors will have minimal, if any, ability to implement land use policy. The following clarification is offered: *MM-OS.45: ~~Project sponsors and l~~**L**ocal governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.*
Public Services	
General comments on MM-PS.8 through MM-PS.14 and MM-PS.21 through MM-PS.24	These measures are taken from the draft Regional Comprehensive Plan (RCP) which is still going through the public review process. The measures listed represent significant regional policy that has yet to be adopted by the region. As such, it is not appropriate to include the measures as mitigation in this document and it is requested that they be deleted. However, if the measures are not deleted, please incorporate the text changes below to reflect that the measures have not received regional approval and reflect the voluntary nature of the RCP.

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	**Comments and Recommendations**
MM-PS.7: Project implementation agencies shall integrate green building measures into project design such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures would include the following: …	The following changes are requested: *MM-PS.7: Project implementation agencies ~~shall~~ **should** integrate green building measures into project design such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. These measures ~~would~~ **could** include the following: …*
MM-PS.8: Project implementation agencies shall discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, landfills should be sited with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.	Most project implementation agencies, including most local governments and county transportation commissions, do not have authority or purview over the siting of new landfills. This measure should be applicable only to the appropriate agency. Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word "shall" in the first sentence to "should."
MM-PS.9: Project implementation agencies shall discourage exporting of locally generated waste outside of the SCAG region. Disposal within the county where the waste originates shall be encouraged as much as possible. Green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMP and RTP policies should be required.	Please clarify who would be responsible for this measure, ensuring that it is an appropriate agency and change the word "shall" in the first sentence to "should."
MM-PS.10: Project implementation agencies shall adopt Zero Waste goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.	Zero waste policies are very controversial and should only be recommended if regional consensus and support are achieved. Additionally, please clarify who would be responsible for this measure ensuring that it is an appropriate agency. The following changes are recommended: *MM-PS.10: Project implementation agencies ~~shall~~ ~~adopt~~ **should encourage** ~~Zero Waste~~ **waste reduction** goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.*

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
MM-PS.11: Project implementation agencies shall build local markets for waste prevention, reduction, and recycling practices.	Many project implementation agencies do not have the means to build local markets for waste prevention. As such, the following changes are requested: *MM-PS.11: ~~Project implementation agencies shall~~* ***Waste management agencies and companies should encourage*** *~~build~~* ***the development of*** *local markets for waste prevention, reduction, and recycling practices.*
MM-PS.12: Project implementation agencies shall develop ordinances that promote waste prevention and recycling such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and instituting ordinances to divert food waste away from landfills and toward food banks and composting facilities.	Please clarify who would be responsible for this measure, ensuring that it is an appropriate agency and the following changes are requested: *MM-PS.12: Project implementation agencies~~ shall develop ordinances that promote~~* ***should encourage*** *waste prevention and recycling* ***activities*** *~~such as: requiring~~* ***such as developing programs for*** *waste prevention and recycling efforts at all large events and venues; ~~implementing~~* ***implementation of*** *recycled content procurement programs; and ~~instituting ordinances to~~* ***developing opportunities to*** *divert food waste away from landfills ~~and~~ toward ~~food banks and~~ composting facilities.*
MM-PS.13: Project implementation agencies shall develop environmentally friendly alternative waste management strategies such as composting, recycling, and conversion technologies.	Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word "shall" to "should."
MM-PS.14: Project implementation agencies shall develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and the following changes are requested: *MM-PS.14:* ***Where practical and feasible, p****roject implementation agencies ~~shall~~* ***should, in coordination with waste management agencies,*** *develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.*
MM-PS.21: Project implementation agencies shall coordinate regional approaches and strategic siting of waste management facilities.	Per the discussion on MM-PS.8, please clarify who would be responsible for this measure, ensuring that it is an appropriate agency and change the word "shall" to "should."

Mitigation Measure	**Comments and Recommendations**
MM-PS.22: Project implementation agencies shall facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	Please clarify who would be responsible for this measure, ensuring that it is an appropriate agency: *MM-PS.22: Project implementation agencies ~~shall~~* ***should encourage and, where practical and feasible,*** *facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material. ~~by making priority funding available for projects that involve co-location of facilities~~*
MM-PS.23: Project implementation agencies shall prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities in conjunction with existing waste management or material recovery facilities.	Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word "shall" to "should."
MM-PS.24: Project implementation agencies shall increase programs to educate the public and increase awareness of reuse, recycling, composting, and green building benefits and raise consumer education issues at the county and city level, as well as at local school districts and education facilities.	Please clarify who would be responsible for this measure ensuring that it is an appropriate agency and change the word "shall" to "should."
Water	
MM-W.20: Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.	The following text changes are requested: *MM-W.20: Local governments should encourage ~~Low Impact Development~~* ***low impact development*** *and* ***encourage the incorporation of*** *natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments****, where practical and feasible,****.*
MM-W.21: Local governments should implement green infrastructure and water-related green building practices through incentives and ordinances. Green building resources include the U.S. Green Building Council's Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.	The following text changes are requested: *MM-W.21: Local governments should implement****, where practical and feasible,*** *green infrastructure and water-related green building practices through incentives and ordinances. Green building resources include the U.S. Green Building Council's Leadership in Energy and Environmental Design, Green Point Rated Homes, and the California Green Builder Program.*

Mitigation Measure	**Comments and Recommendations**
MM-W.23: Developers, local governments, and water agencies should maximize permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	The following text changes are requested: *MM-W.23: Developers, local governments, and water agencies should maximize**, where practical and feasible,** permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.*
MM-W.24: SCAG shall continue to work with local jurisdictions and water quality agencies, through its Water Policy Task Force and other means, to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur during as part of SCAG's ongoing regional planning efforts.	SCAG should recognize and incorporate existing regional water planning efforts and not duplicate existing efforts. SCAG is encouraged to coordinate with these existing programs and processes. The following text changes are requested: *MM-W.24: SCAG shall continue to work with local jurisdictions and water quality agencies, through its Water Policy Task Force and other means, to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided**, to the extent practical and feasible,** through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur **as part of current and existing regional coordination efforts and** ~~during as part of~~ **with additional coordination opportunities provided through** SCAG's ongoing regional planning efforts.*
MM-W.25: SCAG shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge. Future adverse impacts shall be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region. Meetings of SCAG's Water Policy Task Force and Regional Council offer an opportunity for local jurisdictions and water agencies to share information and strategies for improving regional performance in these efforts.	The following text changes are requested: *MM-W.25: SCAG shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge**, including consideration of alternative recharge technologies**. Future adverse impacts shall be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region. Meetings of SCAG's Water Policy Task Force and Regional Council offer an opportunity for local jurisdictions and water agencies to share information and strategies for improving regional performance in these efforts.*

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
MM-W.30: Project developers and agencies should consider potential climate change hydrology and attendant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	The methodology and base data necessary for these analyses are still being developed. Further, local water agencies and project developers must rely on regional water agencies to establish the analysis such that they can incorporate it into the water plans. As such, the following text changes are requested. *MM-W.30: ~~Project developers and~~* ***Regional water*** *agencies should consider****, to the extent feasible,*** *potential climate change hydrology and attendant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.*
MM-W.33: SCAG shall encourage the kind of regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.	Because existing regional programs currently exist to address these issues, the following change to the text is requested: *MM-W.33: SCAG****, in coordination with regional water agencies,*** *shall encourage the kind of regional coordination throughout California and the Colorado River Basin that develops and supports sustainable policies in accommodating growth.*
MM-W.34: SCAG shall facilitate information sharing about the management and status of the Sacramento River Delta, the Colorado River Basin, and other water supply source areas of importance to local water supply.	Because existing regional programs currently existing to address these issues, the following change to the text is requested: *MM-W.34: SCAG****, in coordination with regional water agencies,*** *shall facilitate information sharing about the management and status of the Sacramento River Delta, the Colorado River Basin, and other water supply source areas of importance to local water supply.*

Attachment 2: Comments on Mitigation Measures included in the draft 2008 Program Environmental Impact Report

Mitigation Measure	Comments and Recommendations
MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG's ongoing regional planning efforts. SCAG's Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions: • Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand. • Involve the region's water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions. • Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects. • Promote water-efficient land use development. • The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region's water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.	Because existing regional programs currently existing to address these issues, the following change to the text is requested: *MM-W.36: Future impacts to water supply shall be minimized through cooperation, information sharing, and program development as part of SCAG's ongoing regional planning efforts* ***in coordination with regional water agencies****. SCAG's Water Policy Task Force presents an opportunity for local jurisdictions and water agencies to share information and strategies (such as those listed above) about their on-going water supply planning efforts, including the following types of actions:* *• Minimize impacts to water supply by developing incentives, education and policies to further encourage water conservation and thereby reduce demand.* *• Involve the region's water supply agencies in planning efforts in order to make water resource information, such as water supply and water quality, location of recharge areas and groundwater, and other useful information available to local jurisdictions for use in their land use planning and decisions.* *• Provide, as appropriate, legislative support and advocacy of regional water conservation, supply and water quality projects.* *• Promote water-efficien****cy in land*** *~~t land use~~ development.* *• The Water Policy Task Force and other ongoing regional planning efforts present an opportunity for SCAG to partner with the region's water agencies in outreaching to local governments, special water districts, and the California Department of Water Resources on important water supply issues. SCAG provides a unique opportunity to increase two-way communication between land use and water planners. The goals of the Task Force would not be to duplicate existing efforts of the water agencies.*

RAILWAY

Mark P. Stehly

AVP Environment & Research and Development

BNSF Railway Company

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February 15, 2008

Via Federal Express and E-Mail

Mr. Gary Ovitt
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

Re: BNSF Comments on 2008 Draft RTP and Program EIR

Dear Supervisor Ovitt:

BNSF Railway appreciates your consideration of the following comments on the 2008 Draft Regional Transportation Plan ("Draft RTP") and Program Environmental Impact Report ("PEIR") for the RTP. The Port of Los Angeles ("POLA") is currently preparing a Project Environmental Impact Report for the proposed Southern California International Gateway ("SCIG") near-dock intermodal facility. Although SCIG is privately funded and the RTP focuses on government-funded projects, BNSF believes that SCAG has appropriately included SCIG in the Draft RTP, because a documented reduction in emissions will occur for a number of years if SCIG is approved and constructed. Inclusion of SCIG in the RTP in this unique situation serves the long-range planning functions of the RTP as explained in both the PEIR and the Draft RTP.

BNSF respectfully requests that SCAG confirm that the SCIG project will be included in the Final RTP as indicated by the sections of the Draft RTP discussed herein. BNSF also requests that the Final RTP provide that SCIG is privately funded. This information is important to ensure that the record is clear that BNSF is not seeking, and that SCIG will not require, any public funding.

1. The PEIR: Recognition of the RTP's long-range planning function and the importance of goods movement in the Southern California economy

One of the most important functions of the RTP is to provide "a description of regional growth trends to help identify future needs for travel and goods movement." PEIR at p. ES-2. "The Plan provides an assessment of current and projected demand for travel and goods movement in the region, and includes actions to meet the region's mobility and accessibility needs. These actions must be within fiscal constraints . . . ." PEIR at p. 2-3.

The PEIR also recognizes that a large part of the region's economy and employment is centered around the San Pedro Bay Ports (Long Beach and Los Angeles). PEIR at p. 3.11-6. SCAG notes that the Ports dominate the container trade in the Americas, and that together, these two ports rank third in the world, behind Rotterdam and Hong Kong, as the busiest maritime ports. PEIR at p. 3.14-3.15, citing "Growth of California Ports – Opportunities and Challenges, A Report to the Legislature," California Marine and Intermodal Transportation System Advisory Council, April, 2007.

The PEIR also explains that numerous stakeholder task force committees, including the Goods Movement Task Force, worked for more than three years to identify and refine components of the RTP. PEIR at p. 1-5. As a result, the Draft RTP contains a Goods Movement Report that specifically refers to the SCIG project.

BNSF concurs with the PEIR's statements and goals regarding the importance of long-range forecasting and planning, including that pertaining to goods movement. As a result, SCAG should confirm that the Final RTP will identify the SCIG project in sufficient detail to allow SCAG to consider emissions reductions and other planning impacts that will result from SCIG's future implementation.

2. The Draft RTP: Forecasts regarding goods movement growth and the Port's projected inability to handle increased cargo beginning in 2010

BNSF understands that SCAG has included the privately-funded SCIG project in the Draft RTP because its inclusion is consistent with the long-range planning goals described in the PEIR. For example, the Draft RTP states that in developing baseline regional transportation forecasts, SCAG included:

> . . . demand forecasts for cargo and passengers and the regional ports and airports. The port and airport demand forecasts include projects that improve operations and increase capacity. Intermodal expansion was assumed in terms of additional capacity at the ports for goods movement growth, and the trips associated therewith were assumed located in the Inland Empire. The VMT [vehicle miles traveled] and related emissions regarding such trips are incorporated into the modeling analysis.

Draft RTP at p. 52. If SCIG is approved, it will reduce truck trips to the Inland Empire, and thus reduce the VMT associated with SCAG's current assumptions. The Goods Movement Report recognizes the fact that SCIG will reduce truck-related VMT:

> Future near-dock intermodal yard capacity expansions associated with the development of the Southern California International Gateway (SCIG) and expansion of the ICTF may also play a key role in addressing high density truck traffic.

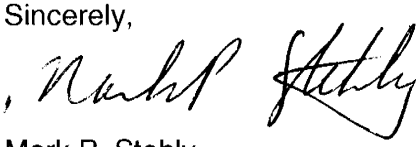
RTP Goods Movement Report at p. 15. SCAG also observes that: "The BNSF has also proposed developing a near-dock facility called SCIG, which is projected to accommodate increasing trade volumes while also reducing truck traffic on the I-710." RTP Goods Movement Report at p. 33. Also, Table 4 at page 9 of the RTP Goods Movement Report highlights planned on-dock and near dock facilities in the San Pedro Bay Ports area, and lists what appears to be SCIG in the Phase II near-term category (by end of 2010). It is referred to as "New Near-Dock - South of Sepulveda (potential)." POLA is listed as the sponsor and the development cost is listed as n/a. SCAG also has identified "Intermodal Facilities (Location TBD)" in the Regional RTP section of the Project Listing Report, which is another report included in the Draft RTP.

None of the references to SCIG in the Draft RTP or the RTP Goods Movement Report, however, indicate that SCIG will be privately funded. This is an important distinction that will make the Final RTP more precise by ensuring that other government agencies and the public are aware that BNSF is not seeking any public funds for the SCIG project. In addition, the 2008 Final RTP will be the first RTP that SCAG will issue after the passage of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users ("SAFETEA-LU"), Public Law 109-59, August 10, 2005. Under this recent law, the RTP must contain a financial plan that "demonstrates how the adopted transportation plan can be implemented, [and] indicates resources from public and private

sources that are reasonably expected to be made available to carry out the plan . . . . SAFETEA-LU Section 134(i)(2)(C). In view of the fact that SCIG will increase intermodal capacity at the Ports and will reduce truck-related VMT for at least a portion of the planning horizon addressed in the Draft RTP, it is prudent to note in the Final RTP that SCIG is privately funded.

Thank you for your review of these comments and SCAG's consideration of BNSF's requests.

Sincerely,



Mark P. Stehly
AVP Environment & Research Development

cc: Mary Nan Doran, Associate General Counsel

February 18, 2008

Southern California Association of Governments
Attention: Jessica Meany
818 West Street, 12th Floor
Los Angeles, California 90017

Subject: Comments on the 2008 Draft Regional Transportation Plan (RTP)

Building Industry Association of Southern California

1330 South Valley Vista Drive
Diamond Bar, California 91765
909.396.9993
Fax: 909.396.1571
http://www.biasc.org

Dear President Ovitt and Regional Council Members:

On behalf of the over 2,300 member-companies of the Building Industry Association of Southern California (BIA/SC), I appreciate the opportunity to provide our comments on the recently released draft of the Regional Transportation Plan (RTP). BIA/SC is a non-profit trade association that represents over 175,000 men and women in the home building and construction industries.

The RTP is a critical document to the building industry. We also believe it is vital to Southern California's economic future. Southern California prides itself on having a diverse region not only in terms of its geography, but in many other aspects as well. It should come as no surprise that our needs in transportation, housing and jobs vary greatly from county-to-county, city-to-city and community-to-community.

Recommendation: Use Baseline Forecast in RTP

We appreciate SCAG's role in coordinating the planning efforts of the region. Through our region's Council of Governments (COG's) and transportation agencies (MTA, OCTA, SANBAG, RCTC, etc), SCAG is able to compile the transportation needs within the region. And the backbone of this process is planning data provided by cities and counties. It is through the local government process that land-use decisions are vetted by communities, interest groups and ultimately local elected officials. It is for this reason that **BIA/SC strongly opposes the inclusion and use of "Policy Growth" forecasts in the RTP**.

Cities and counties go through exhaustive planning procedures when planning for the needs of their communities. They examine many factors when evaluating how to best plan for their future growth. Employment opportunities, current housing stock and other critical information, such as infrastructure capacity, are considered. BIA/SC strongly believes the detailed analysis and review that takes place at the local level - by those with the appropriate "on the ground" and circumspect, individual views - should be the underpinning of our RTP. Therefore, we urge the Regional Council to include the "Baseline" forecast as the foundation for the RTP.

Antelope Valley Chapter
Baldy View Chapter
Desert Chapter
L.A./Ventura Chapter
Orange County Chapter
Riverside County Chapter

Transportation needs in our region vary greatly. Whether it is the requirement for an additional traffic lane in an urbanized area, establishing increased transit opportunities to a vibrant business district, or building a new corridor to connect existing communities such as the proposed High Desert corridor, these decisions should be based upon local planning decisions. The Policy Growth forecast is a derivative of SCAG's Compass Blueprint project. The Compass project is a voluntary program whereby cities and/or counties can engage with SCAG's staff and hired consultants on planning activities. This program was never discussed as a mandatory planning tool whereby local decision-making would be placed in the hands of SCAG's Regional Council. **By including the Policy Growth forecast in the RTP, our region's transportation plan will be inconsistent with general plans and zoning codes that are the purview of city and county elected officials**.

Recommendation: Remove Inaccurate References

Throughout the RTP, the use of Baseline Forecast has been characterized as "Business as Usual." This term implies that communities are not embracing mixed-used development and increased densities. This claim is unsubstantiated. One does not need to look very hard to see that these types of projects are being developed throughout Southern California. These projects are possible because of evolving consumer choice and economics. Just as many Southern California families desire to live in a single family detached neighborhood, others prefer a more compact and walk-able environment. As stated earlier, our communities vary and so does their willingness and desire for change. Cities that have begun to permit a variety of development choices in their communities should be encouraged.

The Draft RTP also includes language regarding the usage of the term "sprawl." We also believe this to be potentially misleading. For example, when describing the projected growth of the region through the year 2035, the draft RTP includes statements such as, "The baseline forecast supports the current urban sprawl from Los Angeles and Orange Counties to Riverside and San Bernardino Counties. It would yield a growth scenario very similar to the status quo, taking a somewhat 'business as usual' approach that is not steered by regional policies" (pg. 62). We feel that this statement should be eliminated.

Take Orange County, for example. Orange County is the fifth most populous county in the country. While Los Angeles County is the largest county in the country, Orange County is far more dense when you contrast land mass with population. Regarding "regional policies," therefore, it is important to be mindful that land-use decisions are made locally, and that regional policies are advisory. Accordingly, the RTP should not rely upon such broad-brush, uncritical statements as the basis for seeking federal approval of the RTP.

We applaud the inclusion of such critical transportation links as the High Desert Corridor in the RTP. These linkages will provide increased mobility throughout our growing region. With an expected population increase by 2035 of 6 million, or roughly the population of an additional 20 cities the size of Riverside, we must begin making those vital links within our region.

Our region faces many transportation challenges. While we look for the most effective way to increase mobility throughout our region, we encourage the Southern California Association of Governments to create stronger partnerships with our cities and transportation agencies. It will be through these relationships that the best planning will take place at the local level, thereby improving mobility at the regional level.

We appreciate your consideration of our comments and are available to answer any questions you may have.

Respectfully submitted,

Todd Priest
Government Affairs Consultant

CITY OF BURBANK
COMMUNITY DEVELOPMENT DEPARTMENT
275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459
www.ci.burbank.ca.us

February 19, 2008

Southern California Association of Governments
Attn: Ms. Jessica Meaney
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

SENT VIA ELECTRONIC MAIL

Dear Ms. Meaney:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) Draft 2008 Regional Transportation Plan. Staff from the City of Burbank has reviewed the Plan and the Environmental Impact Report and would like to submit the following comments below.

The Draft RTP Highways and Arterials Report shows unexpected trends in average speeds on many freeway segments in Los Angeles County. In particular, Exhibits 12 and 13 show speed increases during the AM and PM peak hour between 2003 Existing and 2035 Base, including portions of Interstate 5, Interstate 10, State Route 60, Interstate 210, Interstate 710, and US 101. While some capacity improvements under the base year are included, certain freeway segments have no capacity improvements, and limited transit improvements are planned under the Base scenario. Also, these speed increases are in spite of two-fold increases in truck traffic on many of these freeways (RTP Table 2.6). Is SCAG projecting decreases in automobile and truck traffic on Los Angeles County freeways under the 2035 Base Year? If so, the City feels that these traffic projections downplay the severe accessibility and congestion degradation that will occur in the urbanized areas of Los Angeles County, and will ultimately misallocate transportation resources from the urbanized core to the outer periphery.

Under the 2035 Scenario, it appears that SCAG is projecting greater rates of traffic growth (VMT) on arterial streets (45% ADT growth) than on freeways (32% ADT growth). This is in contrast to the Plan Scenario, where traffic increases are more equally distributed between freeway and arterial facilities. What land use or transportation strategies under the Plan Scenario cause traffic to be more equally distributed between freeways and arterials?

Figure 5.5 of the Draft RTP indicates that accessibility (the ability for residents to travel from home to work within 45 minutes) deteriorates under the Base Scenario, but slightly improves under the Plan Scenario.

While the City is pleased that SCAG has modified their original Compass Growth Forecast as a result of community input, we still have reservations that some of the commercial and residential densities projected in the City of Burbank conflict with the densities outlined in the City's planned Land Use Element Update. The City feels that, while SCAG's approach to concentrating new development near transit nodes and corridors is an effective way to manage future congestion, care should be taken to ensure that projected growth forecasts are in line with local agency's adopted land use plans.

The City of Burbank continues to disagree with SCAG's forecasted growth projections for the Bob Hope Airport. The City does not believe that the airport's ground access and circulation systems can support 9.4 million annual passengers (MAP) without major increases in ground-access capacity improvements. Required improvements are not politically feasible, and construction of required improvements would be detrimental to existing neighborhoods in the City of Burbank. While the City is in support of new transit connections to the airport, we do not believe that these improvements will provide the necessary ground-access to support the MAP level identified by SCAG. The City currently projects a MAP of 7.2 at the Bob Hope Airport as part of its long-range forecasts.

SCAG is promoting a series of ambitious goods-movement projects to help address increasing truck volumes on the region's highway network. The Draft RTP identifies dedicated truck lanes on many freeways as part of the Comprehensive and Strategic Plans. While truck traffic increases are a significant issue, proposals for extensive, double-deck truck lanes throughout the region should not be considered before a serious effort is made to implement pricing mechanisms to control and mitigate existing truck traffic in the region. While the Draft RTP mentions the desire to study truck congestion pricing and user fees as part of the Strategic Plan, work in this effort should be a top priority for the region, before consideration of expensive and potentially environmentally harmful truck-only facilities. In particular, investigation into how pricing could divert goods movement to rail facilities, and a study of how pricing would affect truck VMT in the region should be considered ahead of any major new facility investments.

Finally, the 2008 Draft RTP should place greater emphasis on the need to explore congestion pricing as a means of allocating our scarce transportation infrastructure resources in the future and as method of changing individual transportation behavior. While car-sharing, transit improvements, and policies to strengthen the transportation –land use connection are necessary components to manage the transportation system, these components are not effective unless policies are enacted to assign marginal economic costs to driving in single-occupancy vehicles, so that transit and other alternatives become more attractive. SCAG should use the 2008 RTP as a policy platform to further a regional discussion of how pricing mechanisms can influence travel behavior, improve air quality, limit sprawl, and provide revenue for needed capital infrastructure.

Thank you again for providing the opportunity to comment on the Draft Regional Transportation Plan and Environmental Impact Report. If you have any further question, please feel free to contact me at 818.238.5270 or via email at dkriske@ci.burbank.ca.us.

Sincerely,

David Kriske
Senior Planner, Community Development Department

THE CALIFORNIA RAILROAD INDUSTRY

February 19, 2008

Gary Ovitt
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

Re: Freight Railroad Comments on 2008 Draft RTP

Dear Supervisor Ovitt:

On behalf of the Association of American Railroads and its Class 1 member freight railroads operating in California (BNSF Railway and Union Pacific Railroad, or the Railroads), we appreciate the opportunity to comment on the 2008 Draft Regional Transportation Plan (Draft RTP) strategies related to freight railroad operations. The constrained plan portion of the Draft RTP proposes three strategies directly related to freight rail investments: mainline capacity expansion, grade separation investments, and locomotive engine upgrades. In addition, the Draft RTP proposes a freight container movement element within its High Speed Regional Transportation (HSRT) strategy. Lastly, the strategic plan portion, as contained in Appendix C of the Goods Movement chapter, summarizes SCAG's preliminary evaluation of scenarios for rail freight electrification.

Rail Expansion Strategies

The Draft RTP proposes approximately $3.0 billion in rail expansion projects to be funded with approximately: $1.5 billion in Rail Container Fee Revenue Bonds, $1.0 billion in Metrolink Revenue Bonds, and $0.5 billion from State 1B grants. The Railroads recognize that investment in rail expansion and rail efficiency is necessary to accommodate projected freight levels. However, the RTP is flawed inasmuch as it interposes a governmental planning organization with little or no expertise in national freight rail operations, such as SCAG, as the strategic planning entity determining when and how private rail lines should be expanded and then requires the private railroads to pay fees to a public entity to pay for those investments. Network development and design is extremely complicated and involves analysis of more than just mainline expansion in a single region. Decisions concerning investment in terminals, rail yards, locomotives, freight cars and siding capacity must be considered in light of trends across the spectrum of national freight demands, along with other investments in other areas outside of the SCAG region to prevent bottlenecks. While international intermodal freight is an important component of rail business, the Railroads have critical network needs (and capital demands) for a host of other customers around the country: wheat, corn and other agricultural products from the Midwest; coal and other minerals from mining operations around the country; industrial products; and automobiles. When and where rail capacity investment on individual rail systems is needed is

a question which requires constant review and revision, is affected by changes in market demands and business cycles, and does not lend itself to the sort of long-term planning which may be more appropriate for a regional government agency planning improvements to an existing highway system. It is imperative Railroads retain authority, and the flexibility that comes with that authority, to make changes to capital investment plans as warranted by changing circumstances over time. Accordingly, the Railroads question the efficacy and appropriateness for SCAG to propose mainline modifications and then essentially tax the industry to pay for these investments.

There are many freight projects that entail extensive public benefits—such as environmental enhancements and improved freight efficiency— a private railroad would not otherwise fund, due to the constraints of capital budgets or the lack of a sufficient return on investment. Public funding in these instances is appropriate and does not represent a public subsidy of private beneficiaries, since a rail carrier will contribute financially commensurate with its benefit, if any.

Finally, the draft RTP proposes a significant increase in the number of Metrolink trains that are proposed to operate on private rail lines. Although the draft RTP does provide for a funding mechanism to generate revenue to assist in the funding of such service, the assumption that such service level is achievable is premature. Any Metrolink expansion, if even possible on freight corridors, will have to be negotiated in the future by the interested parties.

Grade Separation Strategies

The Draft RTP proposes $6.0 billion in new grade separation projects (projects which separate rail and road intersections) to be funded with $3.97 billion in Port Container Fee Revenue Bonds, $0.43 billion in Rail Container Fee Revenue Bonds, approximately $0.97 billion in State 1B grants, and $0.88 billion from county contributions. Standard grade separation projects do not enhance velocity, throughput or capacity for railroad operations. Instead, such projects provide a distinctly public benefit by moving vehicles resulting from nearby development over or under rail lines. Investments should be funded by a variety of public funding sources, including the National Highway Trust Fund, other federal sources, and contributions by the state and local sector.

Locomotive Engine Upgrades

The Draft RTP proposes $3.8 billion be spent to accelerate introduction of Tier 3 and Tier 4 locomotives in the SCAG region, to be funded with $1.88 billion in Rail Container Fee Revenue Bonds, and $1.88 billion from U.S. EPA grants.

The Draft RTP incorrectly indicates that Tier 3 locomotives will be available in 2009; the U.S. EPA NPRM indicates that Tier 3 locomotives will not be available until 2012. SCAG should clarify whether its locomotive engine upgrade strategy will apply to Tier 3 locomotives, or if the strategy only applies to Tier 4.

SCAG assumes that half of the funding for the locomotive engine upgrade strategy will be provided by grants from U.S. EPA. However, SCAG has not documented any evidence that U.S. EPA has committed to this funding, and without such evidence that the grants are "committed, available, or reasonably available revenue sources," SCAG should not include this strategy in the financially constrained RTP.

Early investment in Tier 4 locomotives will provide a predominantly public benefit. SCAG's proposal that the Railroads pay for 50% of the cost of the expedited purchases imposes an obligation on the private sector to fund public benefits in a manner that violates the carefully developed regulatory framework contemplated by the recently completed federal rules. The Railroads understand that while Tier 4 locomotives will have lower air emissions, it is expected that there will be a decrease in fuel economy, a loss of range, increased capital costs, increased operating costs, increased maintenance costs, and require substantial investment in new infrastructure to support the operation of the new locomotives. The Railroads do not and cannot agree with SCAG's proposal that the Railroads pay 50% of the cost of the expedited new locomotives.

High Speed Regional Transportation

The Draft RTP proposes to construct a maglev system to move freight containers from an undetermined port location to another undetermined freight terminal along the I-710 corridor. The maglev infrastructure will be privately financed by American Maglev over existing public right of ways. Unfortunately the Draft RTP lacks detail on several important elements of the project. The Railroads submitted comments to SCAG on the feasibility of an HSRT freight system in June and October 2007. The following points summarize Railroad concerns:

1. Detailed SCAG contractor spreadsheets showing how all aspects of the project are analyzed (revenues, costs, or emission reductions) are necessary in order to develop substantive comments.
2. SCAG should clearly define the project by providing all of the necessary details, including the current assumptions regarding the number of containers moved, the number of cars, the speed of the moves (transit time), the number of tracks required at the ports and the inland facility, and the revised maps showing the chosen routes.
3. The lack of data regarding the undefined Port Facility or an inland empire facility makes it almost impossible to assess the feasibility of the project. The project cannot be assessed for the RTP without this information.
4. A high speed rail project which terminates in or around the inland empire will not reduce truck travel (VMT); it will merely relocate the VMT. The VMT associated with the millions of containers currently moved near the ports will simply shift to a concentrated location in the inland area.

5. SCAG should address the issue of redundancy with the current system.
6. Developing a high speed system for freight alone will be very complicated. Integrating the freight system with the passenger system seems significantly more difficult. No information about this integration has been presented.
7. Funding, interagency coordination, and construction issues also need to be addressed.

The Draft RTP indicates that a fee will be charged to help pay the cost of the freight maglev system. However, it does indicate the amount of the fee and who would be responsible for paying the fee.

Electrification for Freight Rail Lines

The most recent SCAG proposals, and all previous studies of electrification in southern California, raise insurmountable operational and cost-effectiveness issues that must be thoroughly considered in any public policy discussion. While the concepts may seem simple at first, the unique complexity of railroad operations in southern California and the large distances considered for electrification make the analysis of electrification far more complex than one might expect. There is a special conundrum presented by electrification of a linear system; to get maximum benefits and avoid doubling-up on different kinds of locomotive investments, the electrified system has to be so massive that the costs to achieve relatively few tons of emissions reductions become astronomical.

Simply put, electrification of the Southern California freight and passenger lines will lead to increased inefficiencies (fewer containers could be moved on the system), tremendous costs (potentially $10 billion-$50 billion), few emission reductions, increased visual impacts from new substations and power lines, and decreased system reliability.

The Railroads submitted comments to SCAG on the feasibility of freight railroad electrification on February 15, 2008. A copy of these comments is attached to this letter. Please review these comments for more detail.

Thank you for the opportunity to provide comments. If you have any questions or concerns, please call me at 415-415-4213 x12 or Peter Okurowski at 925-339-3500.

Sincerely,

Kirk Marckwald
Principal, California Environmental Associates
On behalf of the California Railroad Industry

cc:
Hasan Ikhrata, SCAG
Scott Moore, UPRR
Mark Stehly, BNSF

attachment

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGAR, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Office of Public Transportation & Regional Planning
100 S. Main Street, M.S. 16
LOS ANGELES, CA 90012-3606

(213) 897-0362

February 19, 2008

Mr. Hasan Ikhrata, Executive Director
Southern California Association of Governments
818 W. 7th Street 12th Floor
Los Angeles, California 90017-3435

Subject: Draft 2008 Regional Transportation Plan (RTP) Comments.

Dear Mr. Ikhrata:

The Department of Transportation (Department) wishes to thank the Southern California Association of Governments (SCAG) for the opportunity to review and comment on the Draft 2008 RTP. SCAG has developed a RTP that is consistent with the Department's transportation plans and goals.

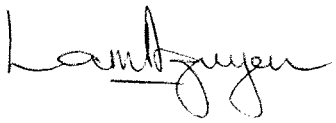
The Department would like to commend SCAG for developing a comprehensive planning process that included Department District staff on the regional planning committees and task forces. SCAG's extensive outreach effort to encourage participation of the regional stakeholder agencies, community interest groups, and the general public served as an excellent tool to develop the technical analysis and policy recommendations included in the Plan.

The 2008 Draft RTP was distributed to the Department Divisions in Sacramento and Districts 7 (Los Angeles and Ventura Counties), 8 (San Bernardino & Riverside Counties), 11 (Imperial County) and 12 (Orange County). The offices within each Division and District were given the opportunity to review and comment on the document according the California Regional Transportation Guidelines.

Submitted as an attachment, are detailed comments on the Draft 2008 RTP that address both general and specific areas of interest to the Department. The Department affirms its support for the 2008 Regional Transportation Plan, its goals and policies including the full range of multi-modal and inter-modal strategic investments needed to achieve implementation of the RTP.

Department staff looks forward to an on-going working relationship with SCAG staff and to resolving transportation planning issues together.

Sincerely,



Lam Nguyen
Interim Deputy District Director
Planning and Public Transportation
Caltrans District 7

Attachment

Comments for Draft 2008 Regional Transportation Plan (RTP)	Page number
RTP should address the proposed Desert Xpress between Victorville and Las Vegas. The DesertXpress project proposes to use rail to connect Southern California to Las Vegas Nevada. The project is intended to divert vehicle traffic from the I-15 between Victorville and Las Vegas.	General Comment
The Department accepts the "baseline forecast" as the foundation for the RTP 2008 modeling. This forecast is based on local input from the counties (i.e. CDR's OCP 2006 for Orange County).	General Comment
Other alternatives proposed by SCAG with local input are variations of the base scenario (Baseline), with Socio-Economic data shifting within the region. Please keep in mind that the SED totals for the SCAG region remains virtually unchanged.	General Comment
The Department supports the SCAG Blueprint Planning activities outlined in the Draft RTP that increase policy and planning coordination for transportation and land use between agencies and communities across the SCAG region. Thoughtful land use and transportation infrastructure planning will benefit the region by increasing transportation alternatives, increasing connectivity between modes of travel, decreasing congestion, and providing a framework for emergency and security coordination planning needed in today's world.	General Comment
Another important benefit of Blueprint Planning is providing a clear vision that, when echoed within each jurisdiction, can also provide the framework of support necessary to achieve financing of the major transportation infrastructure projects that will serve the entire region as it competes against other regions for transportation funding.	General Comment
The projects listed in the SCAG Draft RTP (RTIP, RTP and Strategic Plan) Orange County section reflect the Blueprint goals by enhancing and completing the state highway system, increasing connectivity of modes on and off the state highways, by enhancing the capacity of modes off the state highway system, and providing parallel corridors of travel for all modes that will net a reduction in congestion on the state highways, and improve air quality across all modes within the region.	General Comment
We suggest that future updates move the air cargo analysis to the goods movement section, to be consistent with Section 3.19 of the RTP Guidelines (Goods Movement: Maritime/Rail/Trucking/Aviation). It would also enhance an understanding of the totality of the goods movement transportation system; and where air cargo fits within the system.	General Comment
We suggest a broader discussion of inland ports and warehousing issues, and clarification (or footnotes or links) regarding the studies mentioned in support of the claim of reduction of VMT, emissions and more appropriate industrial land use decision-making.	General Comment
There are a few references to SCAG working in partnership with the Southern California Regional Aviation Authority (SCRAA) in order to solve aviation decentralization issues. Since SCRAA decided on January 31, 2008, that their mission does not have enough public support to continue moving forward it would be best to change or remove references to them.	General Comment
First column, last sentence reads: "Unfortunately, our region's roadways, especially the State Highway System owned and operated by Caltrans, have not been maintained adequately." At the end of this sentence add "...due to constrained state and federal funding."	9
Paragraph 4, under Aging Infrastructure, we thought it could best be said as in the following manner: "Our region's roadways, especially the State Highway System, owned and operated by CALTRANS, have been maintained, but other improvements are needed. Pavement surface damage requires an investment of $64,000 per lane...."	9
First column, end of first paragraph states, "...the number of trucks is projected to more than double for several major freeways." Add to the end of this, "...by 2030."	10

Paragraph 2, Line 5, the statement that "freight rail does not add to freeway congestion..." is not accurate. There are many instances where freight rail has caused freeway congestion in Southern California. Hence, it should read , " Freight rail poses serious quality of life issues for many communities. Some communities witness 100 trains per day that are literally splitting communities into two sections for extended periods of time. This impact extends beyond the city boundaries which directly effects regional transportation."	10
Paragraph 3 under Aviation Capacity and Ground Access Constraints, may want to state in the following manner. " The SCAG Region supports the nation's largest regional airport system. The regional airport system (RAS) supports existing and future passenger and freight movement . Considering, population growth additional capacity will be required in Southern California. " On Line 13 and 14, ".....On a national and international level, at 3500 acres, LAX is very small and is the third busiest airport in the nation and ranks fifth busiest internationally in terms of passengers served."	10
Under Air Quality, Climate Change, and Energy Challenges, restate as such: " The SCAG Region continues to have the worst air quality in the nation, despite improvements gained in the last two decades.	10
"Value Pricing" is shown on the pyramid but is not addressed in the report.	13
System Monitoring and Evaluation section: The words "data collection" should be added to make it clear that it is one of the elements of system monitoring and evaluation.	13
Integrated Land Use and Demand Management section: Dedicated dollar amount of funding should be listed for this element.	13
Second bullet at top of page: Suggest adding wording to say, "Also need to create buffers between goods movement and logistics-related land uses from highly sensitive receptors such as neighborhoods, schools, hospitals, parks, etc.	15
Under Strategic Transit Service Policies, since the word significant is not defined in this document, it should probably not be used in this text. Therefore, line 1, should read as such, ".....upon regional transit operators to address challenges that achieve..."	16
Table 2: Can't find where this is referred to in text but notice that bike, pedestrian, TDM, etc. is not included. These are important emissions-reducing modes and should be included.	20
The map showing all the planned goods movement projects is excellent, however, we suggest a footnote or explanation clarifying why the additional potential warehouse sites (indicated by 3 pink circles) were selected.	22
Environmental Justice - "Overall the benefits of time savings will be the lower income groups who pay a smaller share of the taxes." This is an inconsistent statement. Time and taxes are two different things. Transit commuting can take longer, depending upon system schedules and congestion, than driving a car.	28
We suggest expanding the discussion concerning shared rights of way for good movement high speed rail transport and passenger service from the Ports of LA/LB. This is a new concept which we think warrants more discussion. For example, what are the issues/concerns/impediments to implementing this strategy? If the soon-to-be approved MGMAP expands the discussion on this topic, we suggest a reference to the MCGMAP report be included.	32
Performance-Based Plan, first paragraph: It states that "Starting in 1998, SCAG was the first MPO to rely extensively on performance measurement as a means to identify the most effective investments in the region." Do you mean the first MPO in California?	33
We suggest clarification/rewording of the statement concerning the desirability of the Inland Empire as "the most promising location for an inland port facility...however land availability...is rapidly decreasing...suggesting other locations may be more suitable...". As written, the statement seems contradictory.	33

Discussion on Virtual Container Yards: We found the discussion somewhat confusing, particularly the relationship between the text and the map.	52
First column, second paragraph: It lists centerline miles and miles of roadway and then says "most extensive HOV lanes in the country." Should also include # of HOV lane miles for consistency.	63
Growing but Still Modest Public Transit Use section: Has public transit % of all trips increased or decreased? This is an important performance measure and if there is a decrease in the percentage of all trips for public transit, this may indicate the need to explore other strategies to increase the use of public transit.	65
Aging Infrastructure section: second paragraph: The reference to Caltrans can be removed. Reference to ownership & operation of freeways are made on page 9.	66
Air Quality Challenges section. Table 2.7: it would appear to someone not intimately familiar with the SCAB boundaries, that LA County does not have any non-attainment and maintenance areas. Table should clearly note which counties are included in SCAB, so you can look at the table and clearly see which counties are in non attainment for ozone, PM10, PM2.6, etc.	70
The Draft Plan states that, "... the South Coast Air Basin, the Ventura County portion of the South Central Coast Air Basin, and the Mojave and Antelope Valley Air Basins will all be "bumping up" to worse ozone non-attainment designations since they cannot achieve the NAAQS in the time previously assumed" (Pages 70-71). The Imperial County portion of the Salton Sea Air Basin should be included in the list, as EPA has made a proposed finding that the area did not meet the NAAQS by the deadline of June 15, 2007. When EPA finalizes this finding, which is expected this month, the Imperial County will be reclassified ("bumped up") to "moderate" nonattainment.	70-71
The RTP should more clearly identify and quantify regional needs expressed within both short and long-range planning horizons. Currently under the Transportation Strategy section (p.77), the Draft RTP identifies short-term planning horizons as 'projects in the pipeline' and long-range planning horizons in table-formats by transportation mode (ie. Table 3.2 Mixed Flow Highway Projects p. 101).	77
Implementation Program section: First sentence states, "the 2008 RTP Policy Growth Alternative addresses the mandates of transportation planning law..." Should include a footnote to specify which transportation planning law is being referred to.	89
Second column, bulleted list of open space mitigation measures: Should include a bullet that says, "Encourage land use mitigation to create a buffer between transportation facilities and sensitive receptors such as schools, hospitals, and residential uses."	130
Second column, Non Attainment/Maintenance Areas section: The bullets state which areas are in non-attainment and maintenance areas. Looking over this list one could conclude that all of L.A. County is in an attainment area because it is hidden in the name of the basins. Reference to South Coast AirBasin should include county identification.	172
The Draft Plan states that, "The entire Imperial County portion of SSAB is designated as non-attainment for ozone and PM10" (Page 175; Conformity Report page 4; and other locations). It would be less confusing to state that the Imperial County is nonattainment for ozone, and the Imperial Valley portion of Imperial County is nonattainment for PM10.	175

Comments for Good Movement Report for Draft 2008 RTP

SCAG's Goods Movement Strategy in the RTP is incomplete without in-depth consideration of the Imperial Land Ports of Entry. There is only one paragraph given to these vital ports. There are no maps, no discussion of goods movement from these ports, and no air quality conformity discussion. This report and SCAG's Goods Movement Strategy are inadequate when only the maritime ports are considered.	5
Second column, third paragraph regarding Alameda Corridor: I think there needs to be more information about what the Alameda Corridor is and how it functions, such as, the fees it charges, and who operates it? A collaboration of agencies?	11
Second column, first paragraph, last sentence: "This indicates that a large number of port truck access facilities exist along I-710." Not sure what you mean by "port truck access facilities?" And wouldn't the higher percentages of port truck on 710 simply be a function of the 710 is closer to the ports?	14
Table 11: this table should include the costs associated with these health effects. CARB did include those in their table so it is easy to get.	19
First column, add after first sentence: "Also, dedicated truck lanes as well as HSRT would include tolls that would shift more of the freight related highway costs to the freight/logistics industry."	24
Rail Grade Separations: SCAG's own study showed that freight/highway grade separations are the least cost effective method of reducing air emissions. And in fact, air emissions reductions are localized only and extremely small when considered on a regional basis. Perhaps it should be stated as "some local air emissions benefits" so it is not misleading. Also, I think the results of that SCAG study by ICF in May 2007, "Environmental Mitigation Plan for Goods Movement in Southern California" should be included somewhere in the RTP as it shows which mitigation is most cost effective in terms of emissions reductions.	26
First paragraph: Not just land availability but Land Use should be added as something that will have to be addressed if an inland port(s) are considered.	33
Second column, first paragraph, last sentence: I think the statement about SCIG should be qualified with wording such as, "however, neighborhoods in the vicinity of SCIG have voiced their opposition." Need to acknowledge community's position.	33
Appendix C: Freight Rail Electrification: Where is freight electrification addressed in the RTP? Did not see it. Seems like it should be summarized in the RTP itself as one of the alternatives looked at.	40

Comments for Executive Summary

Second column, third paragraph, the word "behavior" is misspelled.	8
Under mobility challenges the RTP discusses maritime ports and airports but it does not discuss land ports.	8-9
Second column, fifth paragraph, discusses cross-border trade activity and the increase in truck trips through Calexico East in Imperial County. It should also discuss how this may indirectly impact San Ysidro.	9
Mobility Measures: Speed and delay should not be the only measures for mobility. Higher speed causes more severe collisions, which causes more delay. Also, as per HCM, the maximum vehicle flow rate occurs at the critical speed, which is typically lower than the design speed.	Page 26, Executive Summary, Table 4 Performance Measures
Quality travel time could be used as a measure, which is travel time in which the traveler has a pleasant and safe traveling experience, in a timely manner, and gets him to where he's going with minimum effort. For example, travel on a train that connects to a shuttle, or a convenient bicycle facility. Mobility has more to do with seamless connections between transportation systems and modes. For example, can a person ride his bicycle safely from his home to a transit station, take his bike on the train, exit the train at the nearest stop to his destination, and complete his trip safely and conveniently on a bicycle?	Page 26, Executive Summary, Table 4 Performance Measures
Adding lanes to roadways may temporarily ease congestion, but it is not a long-term solution. Traffic calming measures on conventional highways can increase mobility by making the streets safer and friendlier to all users.	Page 26, Executive Summary, Table 4 Performance Measures
Accessibility Measures: Is the route to work and school walkable and bikeable? (45 minute by car is way too far.) Reliability Measures: Are transit lines running on schedule? Trains are inherently more reliable because they are not usually delayed by congested roadways. Productivity Measures: Roadway capacity for all modes, not just motor vehicles, transit capacity Safety Measures: Should include bicycle and pedestrian collision data. Pedestrian and bicycle collisions are disproportionally high across the nation. Sustainability Measures: Do not just focus on performance, infrastructure condition, and preservation. Must focus on Social, Environmental, and Economic Sustainability. For example, tollways charging appropriate parking fees are more sustainable than free freeways and free parking. Storm water run-off, noise, air pollution are all major impacts that make roadways less sustainable. Cost Effectiveness: All costs need to be considered in cost/benefit analysis. There are always social, environmental, and economic costs of travel alternatives.	Page 26, Executive Summary, Table 4 Performance Measures
Environmental Justice: Are benefits equally distributed? Are negatives equally distributed? Are negatives equally mitigated? For example, why are there many missing soundwalls in east L.A. and complete high soundwalls that have been re-constructed more than once in Brentwood, Rossmore, and other parts of Orange and L.A. Counties? For example, social, environmental, and economic impacts need to be considered equally for East L.A. as for Brentwood. Impacts on all modes, incuding non-motorized, need to be analyzed and mitigated. For instance, a typical resident in East L.A. is more dependent on walking, bicycling, and riding transit than their counterpart in Brentwood.	Page 26, Executive Summary, Table 4 Performance Measures

Comments for Conformity Report for Draft 2008 RTP

It seems odd that the population and housing projections for Imperial County are both greater in the "Baseline Scenario" than in the "Plan Scenario." (Conformity Report, Tables 1, 2, 3, and 4)	

Comments for Project Listing Report

Project 8020 on Route 98, we have changed the description of the project. The new description should read as follows: "IN CALEXICO FROM 0.5 KM WEST OF DOGWOOD RD. TO 0.3 KM EAST OF ROCKWOOD AVE., WIDEN HWY FROM 1 TO 2 LANES IN EACH DIRECTION WITH RUN POCKETS AT MAJOR INTERSECTIONS". Also on this project it should state that the this project will be constructed in two stages. Also, RTP ID IMP0021 on Route 78 the description should read as follows : "BRAWLEY BYPASS CORRIDOR-IN AND NEAR BRAWLEY FROM 0.5 MILES SOUTH OF BAUGHTMAN ROAD TO MEAD ROAD - 4LANE EXPRESSWAY ON SR 86 TO 0.3 MILES NORTH OF MEAD RD. ON SR 111". The only thing missing is the "NORTH".	2

Comments for Finance Report - High Desert Corridor

The map is unreadable. There should be a better map that shows the construction phases and timetable of the project.	13, Appendix A

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Flex your power!
Be energy efficient!

February 14, 2008

Jessica Meaney
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, California 90017

File: IGR/CEQA
SCH#: None
Log #: 1955
All

Subject: Draft 2008 Regional Transportation Plan

Dear Ms. Meaney,

Thank you for the opportunity to review and comment on the **Draft 2008 Regional Transportation Plan (RTP).** The 2008 RTP presents the transportation vision for this region through the year 2035 and provides a long-term investment framework for addressing the region's transportation and related challenges. The plan is the culmination of a multi-year effort focusing on maintaining and improving the transportation system though a balanced approach that considers system preservation, system operation and management, improved coordination between land-use decisions and transportation investments, and strategic expansion of the system to accommodate future growth. The planning area includes all cities and State routes within Caltrans District 12 and the County of Orange.

Caltrans District 12 is a commenting agency on this plan and we have the following comments:

1. The Department accepts the "baseline forecast" as the foundation for the RTP 2008 modeling. This forecast is based on local input from the counties (i.e. CDR's OCP 2006 for Orange County).

2. Other alternatives proposed by SCAG with local input are variations of the base scenario (Baseline), with Socio-Economic data shifting within the region. Please keep in mind that the SED totals for the SCAG region remain virtually unchanged.

3. The Department supports the SCAG Blueprint Planning activities outlined in the Draft RTP that increase policy and planning coordination for transportation and land use between agencies and communities across the SCAG region. Thoughtful land use and transportation infrastructure planning will benefit the region by increasing transportation alternatives, increasing connectivity between modes of travel, decreasing congestion, and providing a framework for emergency and security coordination planning needed in today's world.

4. Another important benefit of Blueprint Planning is providing a clear vision that, when echoed within each jurisdiction, can also provide the framework of support necessary to achieve financing of the major transportation infrastructure projects that will serve the entire region as it competes against other regions for transportation funding.

5. The projects listed in the SCAG Draft RTP (RTIP, RTP and Strategic Plan) Orange County section reflect the Blueprint goals by enhancing and completing the State highway system, increasing connectivity of modes on and off the State highways, by enhancing the capacity of modes off the State highway system, and providing parallel corridors of travel for all modes that will net a reduction in congestion on the State highways, and improve air quality across all modes within the region.

6. The RTP should more clearly identify and quantify regional needs expressed within both short and long-range planning horizons. Currently under the Transportation Strategy section (p.77), the Draft RTP identifies short-term planning horizons as 'projects in the pipeline' and long-range planning horizons in table-formats by transportation mode (i.e. Table 3.2 Mixed Flow Highway Projects, p. 101).

7. The SCAG Draft RTP PEIR clearly outlines the challenges associated with Global Warming Solutions Act (AB32) and the impact of Greenhouse Gas (GHG) emissions, in particular ozone in the South Coast Air Basin.

8. In addition to AB32 requirements, the Draft RTP indicates that throughout the South Coast Air Basin (which includes Orange County), the region is significantly impacted by worsening ozone non-attainment designations, unidentified long-term reduction of nitrogen oxides (Nox), and upcoming 24-hour PM2.5 standards (particulate matter). (p.71). The Draft SCAG RTP "indicates a positive conformity finding..." (p. 174), and the formal conformity is expected to be achieved with the adopted RTP. Should the RTP fail to conform for any reason, federal sanctions might impact highway project funding and approval (p. 71).

Please continue to keep us informed of this project and any future developments, which could potentially impact the State Transportation Facilities. If you have any questions or need to contact us, please do not hesitate to call Marlon Regisford at (949) 724-2241.

Sincerely,

Ryan Chamberlain, Branch Chief
Local Development/Intergovernmental Review

C: Terry Roberts, Office of Planning and Research

Cathedral City
The Spirit of the Desert

February 14, 2008

Mr. Alan D. Wapner, Chair
Transportation and Communications Committee
Southern California Association of Governments (SCAG)
818 West 7th Street, 12th Floor
Los Angeles, California 90017-3435

RE: 2008 Regional Transportation Plan – Making the Connections

The Cathedral City Council and staff have reviewed a copy of the draft "2008 Regional Transportation Plan - Making the Connections" dated December 6, 2007. The purpose of this letter is to provide the City's comments regarding the development of long-range regional plans and strategies that provide for efficient movement of people, goods and information; enhance economic growth and international trade; and improve the environment and quality of life.

We make the following two general observations:

- The Coachella and Imperial Valleys need to be identified as equal partners with the other SCAG urban centers in the regional planning process. The draft Plan shows these integral SCAG counties merely as insets on each of the technical appendices, which does not allot the emphasis these areas require with respect to the SCAG western region "spill over" that is occurring and will continue to occur.
- The assumptions about grouping of population centers, while attractive, do not appear to be based on the economics of land development or jurisdictional priorities. The Draft Plan must recognize reality and complete the discussion of population migration.

Our comments below provide further detail on these observations.

The Coachella Valley comprises less than 3 percent of the SCAG population; however, potential explosive growth is anticipated between 2008 and 2035. The Draft Plan states that most of the Southern California Association of Governments western region is running out of land. According to the strategy outlined in the draft Plan, emphasis will be placed on growth through transit-oriented development at transit station-adjacent areas coupled with significant employment centers. We interpret this to mean more concentrated areas of dense population and perhaps a shift to vertical growth. It is also likely that growth will "spill

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over" from current densely populated areas west of the Coachella Valley into the Coachella Valley, Imperial Valley and northerly into the "high desert". These are all areas that have been growing significantly in the last 10 years. The Coachella Valley has experienced growth but still has room to grow. The Coachella Valley cities and Riverside County have taken a major step in planning for future growth by adopting a Multiple Species Habitat Conservation Plan which identifies where growth can occur without impacting the environment.

Cathedral City currently participates with the other Coachella Valley jurisdictions in the Coachella Valley's Regional Arterial Program through the Transportation Uniform Mitigation Fee Program (TUMF), Measure A and the soon-to–be-implemented Measure AA program. These programs help fund our regional and local transportation needs. The City supports this type of funding because the source of funds is from those that use the infrastructure, goods and services. In addition, the Coachella Valley jurisdictions are located near or on two major corridors: (1) Interstate 10, our connection with the western portion of the SCAG region; and (2) State Route 86, our connection with Mexico through Imperial County. Participatory funding and location on major transportation corridors are covered prominently for the western SCAG areas, but there is very little discussion of the future effects in the Coachella and Imperial Valleys by potential and probable "spill over" population, businesses, transportation, transit and rail.

There appears to be no discussion in the Draft Plan about the impact visitors have on the six-county region and their contributions to local sales tax, transit occupancy tax and other forms of hidden revenue. These visitors, for either business or recreation purposes, enter the region through our airports, or by rail, automobile or bus and are undeniably a part of the overall transportation impacts that weigh on the existing infrastructure. This is especially true for Cathedral City and the Coachella Valley. This impact does not appear to be addressed to the same degree in the Draft Plan as are the goods movement impacts and time delays.

There are a number of sections of land in the Coachella Valley that are part of the Native American culture and are traffic generators within the Valley. These lands also seem to be omitted from traffic and congestion analysis.

The Palm Springs International Airport (Coachella Valley) was identified in the discussion of air transport facilities, along with other major airports in the SCAG region. There was no mention of the Jackie Cochran (Thermal) Airport. The Thermal Airport has land available for expansion but is not included in the "Goods Movement" discussion. The Thermal Airport is a current asset that could play a larger role in the movement of goods and people in the future.

The planned future truck lane on Interstate 10 between the Monterey Avenue Interchange and Dillon Road, which is a current necessity, is noted in the Draft Plan. There is no discussion, however, of the truck traffic issues from Dillon Road to the California border at the city of Blythe. Also lacking is a discussion of the potential development in the high desert east of the Coachella Valley. There is a significant need for a dedicated truck "climbing" lane in eastern Coachella Valley as Interstate 10 climbs out of the Coachella Valley to the "Cactus City". There are major safety issues with slow moving trucks weaving with high speed passenger cars along this 10-mile stretch of two-lane interstate.

We noted no discussion of the many people in the Coachella Valley and Morongo Basin already commuting to Riverside and San Bernardino to the west or the reverse commute

from Riverside, San Bernardino, Moreno Valley, Beaumont or Banning into the Coachella and Imperial Valleys and the Morongo Basin as well. With the Union Pacific Railroad double-tracking their system through the Coachella Valley, planning a "Metrolink", or even a MAGLEV system in the Coachella Valley should be undertaken to take advantage of the existing Palm Springs and Indio stations. This comment would fit into the discussion of transit oriented development available for employment centers. The Valley has a bus transit system and, as the Valley grows, it is beneficial to plan for expanded service to Valley Metrolink stations, as well as provide additional service along Valley regional arterials. A transit linkage with the Morongo Basin could be established with the Palm Springs station. That linkage would serve Yucca Valley, Joshua Tree and Twentynine Palms.

When trucks move through the western areas to the east they enter the Coachella Valley and either continue east through Blythe and Arizona or south through the Imperial Valley into Mexico. There are several truck stops along Interstate 10, such as those at Ramon Road and Dillon Road, where acceleration/deceleration lanes would be beneficial. One existing example is the west-bound auxiliary lane on Interstate 10 between the Monterey Interchange and the Ramon Road Interchange. Planning for additional auxiliary lanes for all of the interchanges along Interstate 10 in the Coachella Valley would be beneficial for corridor preservation now while land is less expensive than it will be 20 years from now.

We understand the importance of the "2008 Regional Transportation Plan Making the Connections". The population increases in the SCAG western regions will ignite pressures to look eastward for alternatives for living and working locations. We believe it is already in process. Your assistance in increasing identification and planning for this "spill over" growth into the Coachella Valley, Imperial Valley and eastern Riverside and San Bernardino high desert areas would certainly be appreciated. We now look forward to working with our neighboring SCAG regions for the benefit of all areas.

Sincerely,

Kathleen J. DeRosa, Mayor
and
Members of the City Council

cc: Coachella Valley Association of Governments
Riverside County Transportation Commission

Center for Demographic Research

Sponsors:

California State University, Fullerton

Clerk-Recorder Department, County of Orange

County of Orange

Municipal Water District of Orange County

Orange County Council of Governments

Orange County Sanitation District

Orange County Transportation Authority

Orange County Water District

Transportation Corridor Agencies

February 14, 2008

Southern California Association of Governments
Attn: Jessica Meany
meaney@scag.ca.gov
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

SUBJECT: COMMENTS ON THE DRAFT 2008 REGIONAL TRANSPORTATION PLAN, DRAFT BASELINE GROWTH FORECAST AND DRAFT POLICY GROWTH FORECAST

Dear Ms. Meany,

The Center for Demographic Research at Cal State Fullerton has reviewed the Draft 2008 Regional Transportation Plan, its associated reports, the 2008 RTP Draft Baseline Forecast, and the Draft Policy Growth Forecast. We appreciate the opportunity to do so.

First, we would like to express support of recommendations by the Orange County Transportation Authority, the Orange County Council of Governments and other Orange County agencies whose comments also request the approval of the Baseline forecast, which includes the 2006 Orange County Projections as Orange County's local input, in the 2008 RTP.

Our comments are grouped as follows:

1. Adopt the local input, currently contained in the Baseline forecast, as the growth forecast in the 2008 RTP
2. Baseline forecast (local input) is not "business as usual"
3. County and small area comments on the Growth Forecasts
4. Other Comments on the Draft 2008 RTP documents

1. Adopt the local input, currently contained in the Baseline forecast, as the growth forecast in the 2008 RTP

The growth forecast which contains local input, for Orange County this is the 2006 Orange County Projections currently contained in the Baseline forecast, should be adopted at the regional and subregional levels as the growth forecast for use in the 2008 RTP and for findings of air quality conformity.

We strongly encourage, along with Orange County agencies, that the staff recommendation to the Community, Economic and Human Development Committee (CEHD) and Regional Council be to adopt the Baseline forecast which contains the local input for Orange County, was created through a bottoms-up process, is based on local land uses, and already incorporates regional principles and policies.

At the November 1, 2007 meeting of the CEHD, the committee approved the release of the 2008 RTP draft baseline and draft policy growth forecasts for public review and comment. The staff report for this item stated the following:

- "The draft baseline growth forecast for the 2008 RTP represents the most likely growth distribution"

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- "The proposed draft baseline growth forecast reflects local jurisdiction/subregion projections and vision, while there is room on an advisory and volunteer basis for a regional land use strategy, or vision to bring additional mobility benefits, relief congestion, and improve quality of life throughout the region."
- "The draft policy growth forecast for 2008 RTP calls for an advisory redistribution of growth at the county, subregion, city, and TAZ levels from the baseline growth forecast."
- "This advisory policy growth forecast utilizing Compass Blueprint land use strategies and principles, focuses on geographic specific locations with transportation/transit advantage, including the interaction between transit network and employment centers."
- "This policy growth forecast, consistent with Compass Blueprint land use principles is advisory; its implementation would be voluntary and compliment to the baseline growth forecasts based on local jurisdiction/subregional input."

SCAG staff's report supports the use of the Policy forecast/Plan scenario in an advisory capacity. Adoption of the Policy growth forecast (Plan scenario) for use in the RTP would result in mandating the "Plan" policies. Therefore, the only way to retain the Plan scenario as advisory and voluntary would be to adopt the Baseline forecast for use in the 2008 RTP.

TABLE 1

TOPIC	**PAGE REFERENCE**	**RTP NARRATIVE, COMMENT & RECOMMENDATION**
Adoption of Baseline forecast (local input)	RTP p. 55; Integrated Growth Forecast & Regional Land Use Policies Report p. 11	RTP NARRATIVE: "The policy growth forecast calls for an advisory redistribution of growth at the county, subregion, city, and transportation analysis zone (TAZ) levels. The implementation of the policy growth forecast would be voluntary and it complements the baseline growth forecast." COMMENT & RECOMMENDATION: The RTP document states the policy growth forecast or "Plan" forecast would be advisory and voluntary. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.
Adoption of Baseline forecast (local input)	RTP p. 86	RTP NARRATIVE: "In order to yield transportation model performance that legitimately account for the resulting air quality benefits, the assumptions must be: 1) reasonable and realistic; 2) based on the best and most up-to-date information; and 3) must be consistent with planned transportation infrastructure." COMMENT & RECOMMENDATION: The Baseline forecast is based on local input from all SCAG subregions and supports these assumptions. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.
Adoption of Baseline forecast (local input)	RTP p. 86	RTP NARRATIVE: "assumptions are consistent with planned transportation infrastructure" COMMENT & RECOMMENDATION: The local input contained in the Baseline forecast is consistent with what CTCs used in planning their transportation projects. The Baseline forecast should be adopted as the growth forecast for the 2008 RTP.

Adoption of Baseline forecast (local input)	RTP p. 89; Integrated Growth Forecast & Regional Land Use Policies Report p. 45	RTP NARRATIVE: "implementation efforts are ultimately in the hands of local governments … While local land use decisions are outside of its purview, SCAG plans to influence growth patterns through a number of actions that will require collaboration at all levels of both public and private entities." COMMENT & RECOMMENDATION: If implementation of the Plan scenario/Policy forecast is up to the local governments, this implies the Policy forecast is voluntary and the local input (Baseline forecast) should be used within the RTP rather than mandating policies in the "Plan"/policy forecast. If SCAG does not have local land use authority and supports jurisdictions' local control, then the Policy forecast should continue to be advisory and the Baseline forecast should be adopted as the growth forecast for the 2008 RTP.

2. Baseline is Not "business as usual"

The Draft 2008 RTP, the Environmental Justice Report and the Integrated Growth Forecast and Regional Land Use Report state the Baseline forecast is "business as usual". The reports further discuss that the Baseline forecast, which includes local input from all six counties, is similar to the status quo and is not influenced by regional policies. This is not the case. Rather, Orange County jurisdictions have made significant efforts since the 2004 RTP to include projects that are consistent with regional policies and principles endorsed by SCAG. In the Baseline forecast, Orange County shows:

- 91% of the household growth in Orange County will be focused into 14% of its land area
- Almost half (48%) of the job growth will be concentrated into 5% of the land area
- 70% of the household growth will be multi-family
- The county's distribution of single-family detached to multi-family will decline from 51% to 49%.

TABLE 2

TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
Business as Usual	RTP p. 62, 161 Integrated Growth Forecast & Regional Land Use Policies Report p. 11, 25, 28	RTP NARRATIVE: "It [Baseline scenario] would yield a growth scenario very similar to the status quo, taking a somewhat "business as usual" approach" "The Baseline represents "business as usual" " "The Modified 2004 RTP Growth Scenario represents one possible version of the region's growth between 2005 and 2035 based on the previously adopted 2004 RTP forecast distribution." COMMENT & RECOMMENDATION: Page 88 of the RTP states "the [Plan] policies reflect current development patterns in some portions of the region and nascent planning strategies in others." Page 40 of the Integrated Growth Forecast report states "with most cities that are undertaking General Plan updates moving towards

		adopting similar policies and zoning ordinances consistent with the Compass Principles and Growth Vision." Since the 2004 RTP, many Orange County jurisdictions have approved projects that are consistent with Compass Principles which are the foundation of the Plan forecast. These projects deviate from the long-time pattern of "urban sprawl" which is how the Baseline forecast is described. The characterization of the Baseline forecast as "business as usual" is misleading and should be removed. The Modified 2004 RTP, which is an extension of the 2004 RTP growth forecast out to Year 2035 (the horizon year for the 2008 RTP), is a more appropriate characterization of business as usual.

Business as Usual	RTP p. 87; Integrated Growth Forecast & Regional Land Use Policies Report p. 41	<u>RTP NARRATIVE:</u>
		"Based on the land use assumptions developed by SCAG and its local partners, the Regional Council adopted the following set of policies to be incorporated into Compass Blueprint and used in developing the 2008 RTP Policy Growth Alternative"
		
		"These policies were founded upon the Compass Principles developed through the regional growth visioning efforts in preparation for the 2004 RTP.
		• [1] Identify regional strategic areas for infill and investment.
		  o Transit Oriented Development
		  o Existing and emerging centers
		  o Small mixed use areas
		• [2] Structure the future plan on a three-tiered system of centers development: Existing, Planned, Potential
		• [3] Develop "complete communities"
		• [4] Develop nodes on a corridor
		• [5] Plan for additional housing and jobs near transit
		• [6] Plan for a changing demand in types of housing
		• [7] Continue to protect stable existing single family areas
		• [8] Ensure adequate access to open space and preservation of habitat
		• [9] Incorporate local input and feedback on future growth
		• [10] Promote land use patterns supportive of goods movement and logistics industries"
		
		"A summary of the primary tenets include:
		• [A] Improve the localized balance between jobs and housing
		• [B] Increase potential transit ridership by focusing growth to transit supportive areas – LRT, BRT, Metrolink
		• [C] Enhance existing and emerging employment and residential centers
		• [D] Shift the balance of new development from low density single-family housing to mixed-use and higher density housing
		• [E] Maintain stable single-family areas
		• [F] Minimize new separate use commercial or residential

		development in outlying areas • [G] Minimize very high density development in areas that are not effectively served by transit or are not within identified employment centers" COMMENT & RECOMMENDATION: Table 3 below contains an abbreviated list of projects contained within the Baseline forecast which serve as examples of implementation of the policies and tenets labeled above. The characterization of the Baseline scenario as "business as usual" should be removed.

TABLE 3

Jurisdiction	Project	Consistent with Compass Policies and Tenets
Aliso Viejo	Vantis Multi-family residential project	6,9,F
Anaheim	Platinum Triangle	1,2,3,4,5,6,9,A,B,C,F,G
Brea	South Brea Lofts	3,4,6,9,A,F
Buena Park	Founder's Walk/Buenaterra Transit Oriented Development	4,5,6,9,B,C,F
Costa Mesa	North Costa Mesa High-Rise projects	1,2,3,4,6,9,A,B,C,F
Fountain Valley	SAFECO condo & hotel project	3,5,6,9,A,C,F
Fullerton	Cal State Fullerton staff & student housing project	1,2,3,4,5,6,9,A,B,C,F
Garden Grove	Chapman Commons	3,4,6,9,A,C,F
Huntington Beach	Redevelopment old school sites	6,7,9,E,F
Irvine	Residential units into Irvine Business Complex	1,2,3,4,6,9,A,B,C,F,G
Laguna Niguel	Courthouse expansion	7,9,A,B,E,F
Laguna Woods	Garden Center apartments	3,6,C,F
La Palma	Crescent/Moody infill housing	7,9,E,F
Newport Beach	Nov. 2006 General Plan Amendment	3,9,A,C,F
Orange	Bowling alley site reuse for townhomes	4,6,9,A,B,C,F
Placentia	Metrolink station & Transit Oriented Development	2,3,4,5,6,9,A,B,C,F
Santa Ana	MacArthur Place	2,3,4,5,6,9,A,B,C,F
Stanton	Beach Blvd mixed use	3,4,5,6,9,A,B,F
Tustin	Tustin Legacy	1,2,3,4,5,8,9,A,B,C,F
Unincorporated County	Ranch Plan	1,2,3,6,8,9A,C

3. County and small area comments on the Growth Forecasts

The Baseline growth forecast contains local input from all counties within the SCAG region, including the 2006 Orange County Projections. The Baseline forecast was drafted from a bottoms-up process which utilized information based on local land use, current trends and long-term plans. This forecast represents the most likely pattern and distribution of growth envisioned by local governments in the SCAG region.

The Policy growth forecast, referred to in the draft 2008 RTP as the "Plan" forecast, represents SCAG's vision of how growth could be re-distributed in the SCAG region from the local input reflected in the draft Baseline growth forecast.

The Plan scenario/Policy forecast calls for 45,000 people, 9,500 jobs and 15,000 households to be removed from Imperial, Riverside and San Bernardino Counties and placed into Orange County. This

additional growth is beyond what is forecasted by Orange County jurisdictions. In addition, the distribution of housing, population, and employment in the Policy forecast is contrary to many planned developments already approved and underway in and outside of Orange County.

The map in Attachment 1 provides a county-level view of the differences between the Baseline and Policy forecasts and how job growth was redistributed at the census tract level throughout Orange County. The Policy forecast adds 9,500 more jobs into the County over the growth projected by local jurisdictions based on General Plans, and approved and proposed developments. As can be seen by the grey shaded areas throughout the county, job growth was reduced in the majority of the county and refocused into areas near freeways, train stations and employment centers. Full size wall maps may also be provided upon request.

The map in Attachment 2 also shows the redistribution of households in Orange County between the Baseline and Policy forecasts. In addition to the 137,000 households planned in Orange County, the Policy forecast increases the projected growth by over 15,000 households. The grey shaded areas seen throughout the county represent areas where household growth was reduced and then refocused into areas near freeways, train stations and employment centers represented by shades of green.

TABLE 4

TOPIC	**PAGE REFERENCE**	**RTP NARRATIVE, COMMENT & RECOMMENDATION**
Policy growth forecast errors	Integrated Growth Forecast & Regional Land Use Policies Report p. 1	RTP NARRATIVE: "Using an integrated growth forecasting approach and consensus-built growth visioning process …The growth assumptions, vision and policies were all developed in coordination with technical analyses, local input, land use and growth experts, and on-the-ground "reality checks." COMMENT & RECOMMENDATION: The above narrative describes the process that created the Policy forecast/Plan scenario. Review of the Policy forecast dataset at the TAZ/Census tract level (released on November 1) shows the Policy forecast contains errors. Suggested corrections to these errors are contained in Attachment 3 (an Excel data file containing corrections to geographic areas within the Plan forecast). The following are examples of specific errors: • San Clemente: 7,621 jobs and 3,278 additional households placed into city where restrictions such as historical preservation districts, the Coastal Commission and topology would prevent this magnitude of additional growth (CT 421.06, 421.08) • Huntington Beach: 8,660 jobs and 2,843 households placed into city where growth is unlikely to occur, including wetlands areas. • Rossmoor, an unincorporated community in west Orange County: additional 1,288 jobs and 824 households into 1.6 square mile built-out community • Residential development in restricted areas within John Wayne Airport flight path

Policy growth forecast land use assumptions	Integrated Growth Forecast & Regional Land Use Policies Report p. 18	RTP NARRATIVE: "Prior to formulating the 2008 Plan Alternative and assessing its transportation benefits, the appropriate land use assumptions were established." COMMENT & RECOMMENDATION: Review of the land use maps associated with the Policy growth forecast has identified key problem areas. Examples are: • CT 866.01- fully built tract available only for reuse. Policy plan shows 562 additional households with main street uses, city residential, and city neighborhood. Uses are highly unlikely due to existing regional hospital, supporting medical offices, and high density residential (36 units/acre). Reuse to achieve +562 households would require densities greater than 36 units/acre or demolition of hospital and medical office site, both unlikely for area. In Irvine: • Approved General Plan Amendment has residential and mixed use in Spectrum, maps show only Office Park use • Great Park and Heritage Field have designated open space areas not listed • Woodbury should be all residential and open space reserve, not office park • IBC is high end office and going for town center; Policy shows all industrial and decreases in jobs that are unlikely.
Policy growth forecast errors	RTP p.41	RTP NARRATIVE: Development of the 2008 Policy Growth Forecast began with the Workshop Scenario, which represented the closest representation available of regional consensus on how and where growth should occur. COMMENT & RECOMMENDATION: Orange County workshop input overall reflected and requested the inclusion of the 2006 Orange County Projections. The Workshop Scenario does not reflect the feedback provided by the Orange County jurisdictions. For Orange County, the Workshop Scenario should be identical to the Baseline forecast.
Policy growth forecast errors	RTP p. 41	RTP NARRATIVE: "…the land use distribution [of the Plan forecast] is also informed by the results of research performed at a local scale during 2006 and 2007. The primary sources of this research include dozens of Compass Demonstration Projects, where SCAG supported local planning initiatives consistent with these regional goals, and a "reality check" process to explore, in depth, the relationship between local general plans, the RTP and recent demographic trends." COMMENT & RECOMMENDATION: One of the reality checks performed was on an Orange County jurisdiction: Anaheim city. Review of the policy forecast dataset

		shows a number of errors in growth projected. Attachment 3 contains an Excel data file highlighting significant differences between the local input (Baseline forecast) and the Plan's Policy forecast. Please change Policy forecast to reflect Baseline projections.

Policy growth forecast errors	RTP p. 42	RTP NARRATIVE:
		"The local knowledge was critical in documenting so called "pipeline" development that is either already underway or has gone significant distance toward entitlement. These pipeline projects are all but guaranteed to happen."
		
		COMMENT & RECOMMENDATION:
		The Plan scenario/Policy forecast used portions of the TOD/Centers and Envision growth alternatives yet in doing so, redistributed growth throughout the region such that the following approved and currently under development projects were significantly altered:
		• Large portions of growth in the adopted Ranch Plan (Rancho Mission Viejo) in unincorporated south county were relocated (320.23 & 320.56) to other Orange County locations:
		  o 11,300 jobs moved from the Ranch Plan into Irvine, Laguna Beach, Newport Beach, San Clemente, San Juan Capistrano
		  o 8,914 households moved from the Ranch Plan into Irvine, Lake Forest, Laguna Hills, Mission Viejo, Laguna Niguel, San Juan Capistrano, Dana Point, San Clemente
		• Irvine: approximately an additional 11,000 jobs and 6,600 households added into the city in areas under current development, planned through development agreements, or open space.
		• Anaheim's Platinum Triangle: Plan forecast has over 2,200 fewer households than projected in local plans; City expects significant increase in housing and employment as a result of recent amendment to Platinum Triangle Master Land Use Plan

Detailed review of the Policy forecast dataset generated the site specific comments and errors listed below. Please adjust Policy forecast to correct these. See also Attachment 3 for corrected dataset.

Table 5

Census Tract	Policy forecast total over Baseline's local input	Jurisdiction comments
12.02	-21 housing	Should be +91. Laing under construction.
13.01	-10 housing	Should be +111 units. Shea Homes; in final phase.
15.04	+650 housing +2,282 jobs	Area contains Brea Mall which has no plans for this magnitude of additional housing and job growth.
15.05	+112 housing -204 jobs	Area contains Brea Mall which has no plans for this magnitude of additional housing and job growth.
219.12	-25 housing	Area contains approved Irvine Company development, housing reduction is unlikely.
218.15	-366 housing	PepperTree 795 households; La Floresta 1,088 households.
219.14	-9 jobs	Lower job projections in this area are unlikely.

219.18	-19 jobs	Lower job projections in this area are unlikely.
219.24	-640 housing -27 jobs	Lower job projections in this area are unlikely. Area contains approved Irvine Company development, housing reduction unlikely.
524.20	-37 housing	Area contains approved Irvine Company development, housing reduction is unlikely.
758.05	-84 jobs	Lower job projections in this area are unlikely.
758.06	-41 jobs	Lower job projections in this area are unlikely.
758.11	+31 units	Shouldn't be much housing growth here. Area is built out with SFR.
758.12	+161 housing +1,012 jobs	East of freeway with established Single-Family homes. Growth is high for the character and size of parcels.
758.13	+75 housing +1,335 jobs	Shouldn't be much housing growth here. Area is built out with SFR.
758.16	-35 jobs	Lower job projections in this area are unlikely.
759.01	+1,875 housing +4,400 jobs	Too high. Protected Old Town Historic District listed in National Register of Historic Places which greatly constrains future development and infill.
759.02	+712 housing +1,525 jobs	Too high. Protected Old Town Historic District listed in National Register of Historic Places which greatly constrains future development and infill.
760.00	-1,217 jobs	Expansion of St. Joseph Hospital and CHOC along with demand for additional medical office space, lower job growth is unlikely.
761.01	-1,124 +5,351 jobs	Area contains approved Platinum Triangle development; reduction in housing is unlikely as well as job increase is too high.
761.02	-640 housing -974 jobs	This contains UCI medical center, The Block at Orange and criminal justice facilities. It is unlikely that growth will be reduced or fewer than what was projected in Baseline.
762.05	+149 housing +1,020 jobs	Largely built out with SFR. Additional job growth is unlikely.
762.06	+447 housing	Largely built out with SFR. Additional job growth is unlikely.
762.08	+409 housing +732 jobs	Seems too high. This area is a combo of built out SFR and commercial.
882.01	+489 housing	existing SFD neighborhood with no future housing project proposed, should be OCP-2006 #
882.02	+101 housing	existing SFD neighborhood with no future housing project proposed, should be OCP-2006 #
992.20	+220 housing +910 jobs	Only vacant land left is either wetlands or landfill anticipated to be developed for open space use only
992.42	+169 housing	Only vacant land left is designated in General Plan for commercial use.
993.05	+177 housing	Only vacant land left is designated in General Plan for commercial use.
993.07	+495 housing +3,619 jobs	Area has recently redeveloped and not likely to change any time soon. No vacant land left.
994.02	+483 housing +1,002 jobs	Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of maximum 62,500 s.f. of commercial building, 8,000 s.f of industrial building, and zero dwelling units.

994.11	+260 housing +759 jobs	No vacant land left.
994.13	+1,039 housing +2,360 jobs	Area has recently redeveloped as part of a master plan and not likely to change any time soon. Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of max. 62 dwelling units, 17,2000 s.f commercial and 130,000 s.f. of industrial
995.04	+399 housing	Area contains existing, stable, single family residential area, public facilities and a recently approved business park. Is built out and all remaining undeveloped areas are deed restricted by Coastal Development Permits to only allowing for wetland and upland habitat restoration projects.
995.04	-49 jobs	Contains new business park development recently completed; the 182 jobs allocated to CT995.10 should be allocated here.
995.10	+182 jobs	Area is 99% developed as a senior retirement living community. Jobs should be allocated to Census Tract 995.04.

5. Other Comments on the 2008 RTP

TABLE 6

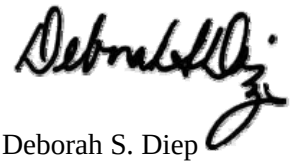
TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
Citation	RTP p. 10 RTP p.70	RTP NARRATIVE: 5,400 premature deaths COMMENT & RECOMMENDATION: Please city the study.
Citation	RTP p. 11	RTP NARRATIVE: "Mixed land uses (i.e., residential developments near work places, restaurants, and shopping centers) with access to public transportation have been shown to save consumers up to 512 gallons of gasoline per year." COMMENT & RECOMMENDATION: Please city the study.
CTC authority does not include implementing Compass Blueprint	RTP p. 91; Integrated Growth Forecast & Regional Land Use Policies Report p. 47	RTP NARRATIVE: "Strategic Initiative: … SCAG and County Transportation Commissions should initiate a program to secure significant resources for implementing Compass Blueprint." COMMENT & RECOMMENDATION: In Orange County, OCTA Board approval would be required before OCTA could spend transportation dollars on development projects that support the Compass Blueprint Program, and there is no precedent for OCTA funding such projects. Please delete reference to County Transportation Commissions.

Citation/ Clarification	RTP p. 104	RTP NARRATIVE: "The changes in land use patterns around our transit investments, referred to transit oriented development (TOD), indicate a result that leads to less auto trips and reduced vehicles miles traveled (VMT) through greater transit use, increased substitution of walk trips, and improved access to local jobs and services." COMMENT & RECOMMENDATION: The statement above should be clarified to state where this conclusion comes from: whether from modeling results of existing TOD or modeling results of future growth scenarios.
Move project to Strategic Plan	RTP p. 117	RTP NARRATIVE: Orangeline High-Speed Transit COMMENT & RECOMMENDATION: Per recommendation of the OCTA Board on 1/28/2008 and subsequent RTP comment letter, remove this project from Constrained Plan and place in Strategic Plan.
RCP mitigation measures	RTP p. 132	RTP NARRATIVE: "The RCP details … these recommendations are included in the EIR as mitigation measures." COMMENT & RECOMMENDATION: The Regional Comprehensive Plan has not been adopted by the Regional Council nor has the public comment period been completed. Mitigation measures based on the RCP that are included in the RTP should be removed.
Equal comparisons for accurate conclusions	RTP p. 27	RTP NARRATIVE: "• Baseline 2035 scenario–Future conditions in 2035 based on the existing transportation system and near-term constrained projects • Plan 2035 scenario–Future conditions in 2035 based on the existing transportation system, near-term constrained projects, and long-term constrained projects In every category, the Plan 2035 scenario shows improvement over the Baseline 2035 scenario." COMMENT & RECOMMENDATION: In order to make accurate comparisons of the outcomes between the Baseline and Plan scenarios, the Baseline scenario should include long-term constrained projects.
Equal comparisons for accurate conclusions	RTP p. 167	RTP NARRATIVE: "This improvement in accessibility is primarily due to the Land Use Integration strategy" COMMENT & RECOMMENDATION: In order to arrive at the stated conclusion, the Baseline and Plan transportation projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The models must be rerun with the Baseline scenario including the long-term constrained projects in order to properly evaluate the differences between the two scenarios.

Equal comparisons for accurate conclusions	RTP p. 170	RTP NARRATIVE: "For each of these categories, models are used to estimate the benefits of the Plan compared to Baseline." COMMENT & RECOMMENDATION: In order to compare the Baseline and Plan scenarios, the list of constrained projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The Baseline scenario must include the long-term constrained projects (which the Plan scenario includes) in order to properly evaluate the differences between the two scenarios.
Equal comparisons for accurate conclusions	RTP p. 170	RTP NARRATIVE: "The comparison of the transportation modeling results between the Baseline Growth Forecast Alternative and the Policy Growth Forecast Alternative isolates the transportation benefits due to regional land use policy." COMMENT & RECOMMENDATION: In order to arrive at the stated conclusion, the Baseline and Plan transportation projects would have to be identical. Page 27 of the RTP (see comment above) states that the Baseline does not include the long-term constrained projects included in the Plan scenario. The models must be rerun with the Baseline scenario including the long-term constrained projects in order to properly evaluate the differences between the two scenarios.

Again, we thank you for your time and consideration of the comments above.

Sincerely,



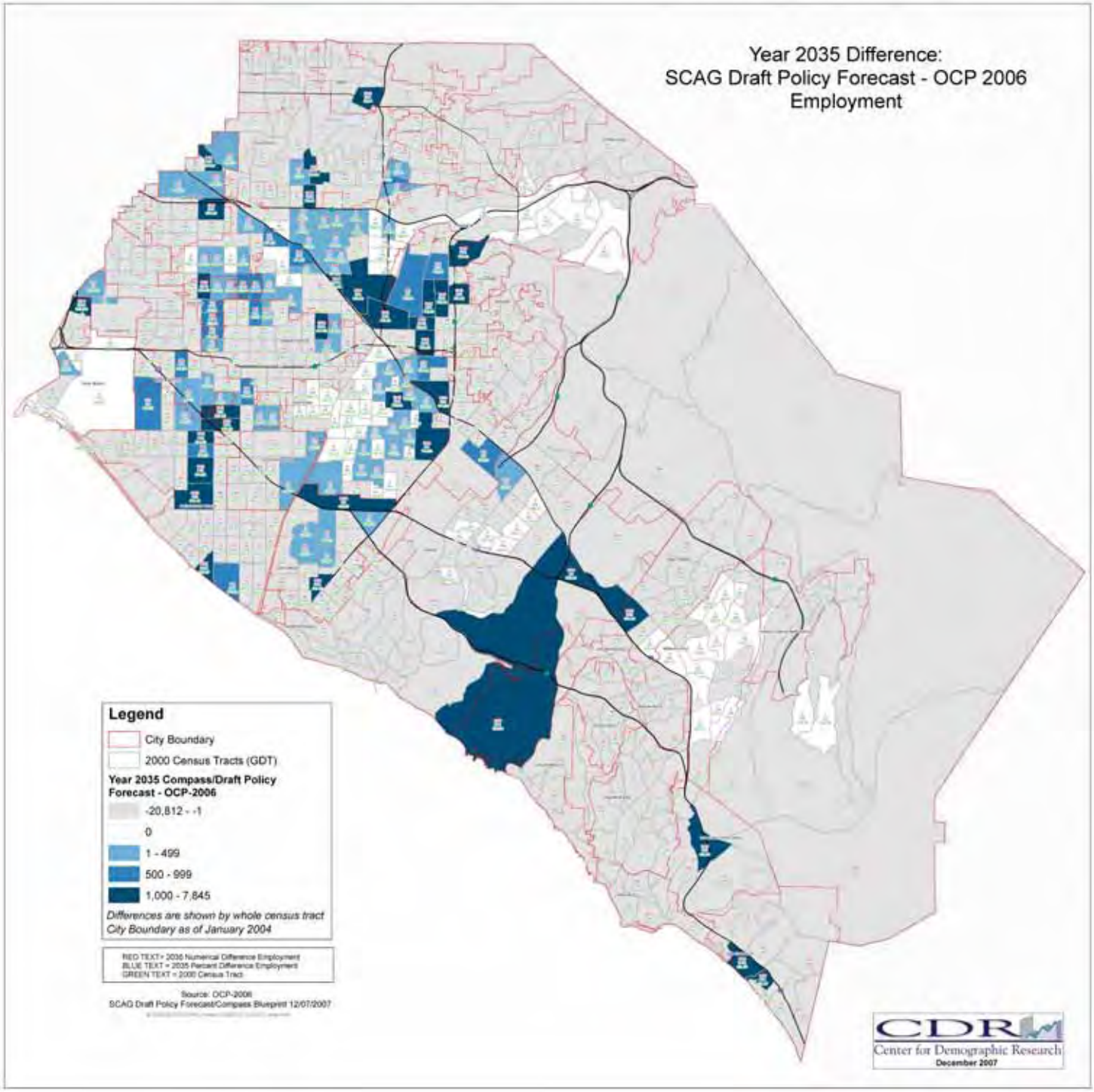
Deborah S. Diep
CDR Director

Attachments: 1) Year 2035 Differences Employment
2) Year 2035 Differences Households
3) Excel dataset: Differences Policy & Baseline forecasts

CC: CDR Management Oversight Committee
CDR Technical Advisory Committee

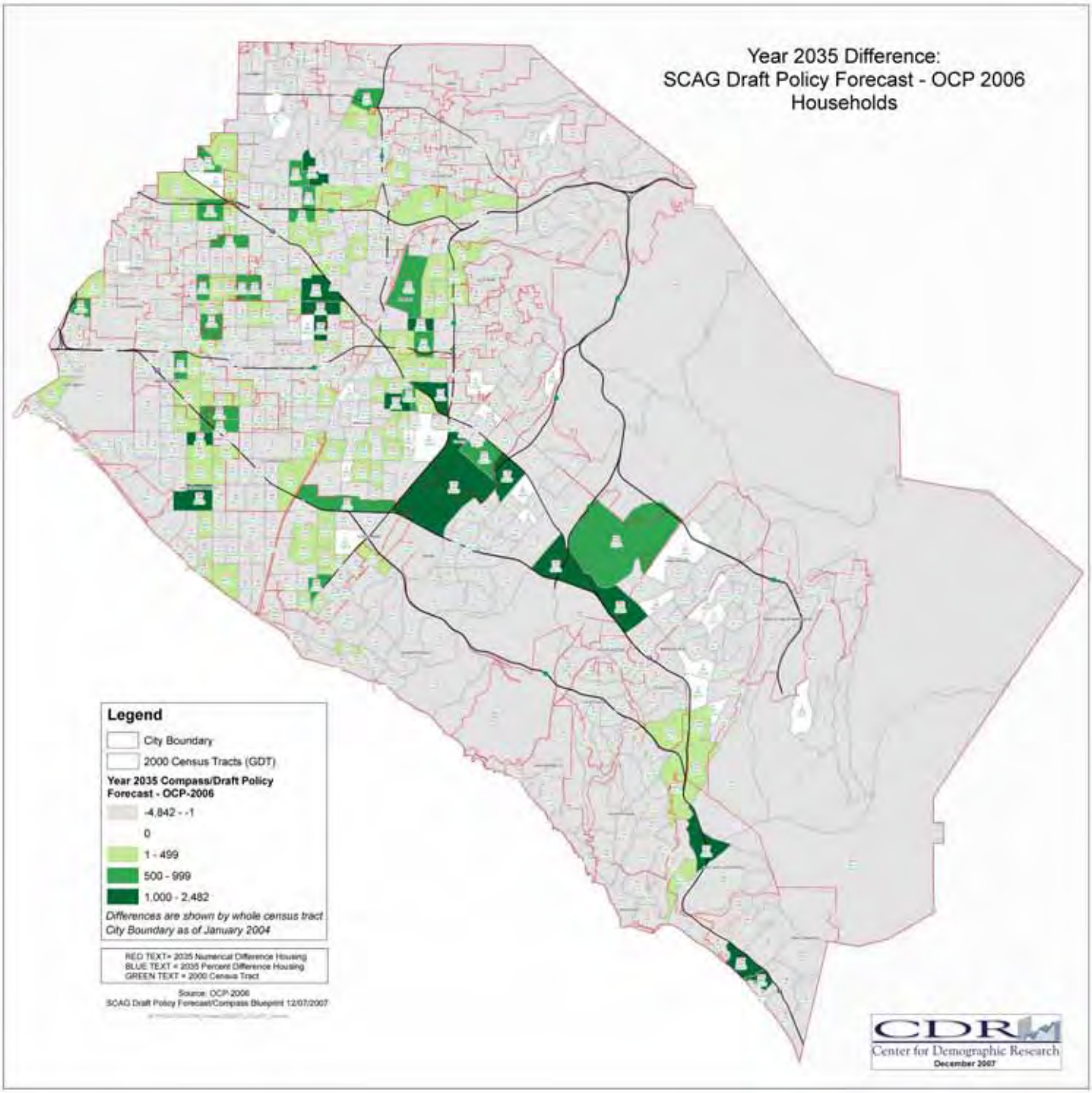
Ms. Meany
2008 RTP comment letter

Attachment 1



Ms. Meany
2008 RTP comment letter

Attachment 2



Attachment 3:
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
11.01	4,726	1,514	1,198	4,686	1,510	1,141	-43	-4	-57	-1%	0%	-5%
11.02	3,485	1,094	808	3,458	1,092	759	-30	-2	-49	-1%	0%	-6%
11.03	5,097	1,442	1,411	5,101	1,434	1,311	34	-8	-100	1%	-1%	-7%
12.01	6,177	1,474	725	6,003	1,441	662	-181	-33	-63	-3%	-2%	-9%
12.02	4,179	1,012	1,476	4,068	991	1,416	-116	-21	-60	-3%	-2%	-4%
13.01	7,348	2,643	3,200	7,277	2,633	3,086	-80	-10	-114	-1%	0%	-4%
13.03	6,607	1,869	1,260	6,547	1,863	1,207	-68	-6	-53	-1%	0%	-4%
13.04	4,617	1,176	2,692	4,508	1,155	2,592	-115	-21	-100	-2%	-2%	-4%
14.01	6,394	1,784	1,741	6,315	1,773	1,673	-43	-11	-68	-1%	-1%	-4%
14.02	5,851	1,583	866	5,805	1,580	823	-53	-3	-43	-1%	0%	-5%
14.03	3,723	1,109	474	3,636	1,089	466	-87	-20	-8	-2%	-2%	-2%
14.04	4,269	1,039	8,908	4,191	1,026	8,295	-82	-13	-613	-2%	-1%	-7%
15.01	7,011	2,471	3,525	6,950	2,464	3,463	-62	-7	-62	-1%	0%	-2%
15.03	6,307	2,016	7,496	6,046	1,944	7,404	-265	-72	-92	-4%	-4%	-1%
15.04	5,082	1,815	6,662	6,861	2,465	8,944	1,777	650	2,282	35%	36%	34%
15.05	7,538	2,437	1,402	7,839	2,549	1,198	289	112	-204	4%	5%	-15%
15.06	5,013	1,670	1,163	4,812	1,607	1,068	-190	-63	-95	-4%	-4%	-8%
15.07	5,008	2,039	9,907	4,896	2,003	9,856	-111	-36	-51	-2%	-2%	-1%
16.01	8,256	2,912	8,784	8,003	2,813	8,667	-245	-99	-117	-3%	-3%	-1%
16.02	5,622	2,100	1,370	5,150	1,934	1,332	-482	-166	-38	-9%	-8%	-3%
17.04	7,044	2,295	3,419	6,834	2,240	3,378	-225	-55	-41	-3%	-2%	-1%
17.05	4,929	1,488	608	4,880	1,482	593	-56	-6	-15	-1%	0%	-2%
17.06	4,414	1,432	2,335	4,270	1,373	2,245	-135	-59	-90	-3%	-4%	-4%
17.07	9,044	3,095	1,553	8,776	3,017	1,481	-282	-78	-72	-3%	-3%	-5%
17.08	4,811	1,444	985	4,783	1,444	961	-35	0	-24	-1%	0%	-2%
18.01	5,988	1,628	4,276	7,041	1,926	4,087	1,042	298	-189	17%	18%	-4%
18.02	8,361	2,124	963	8,247	2,103	911	-124	-21	-52	-1%	-1%	-5%
19.01	3,105	811	590	3,041	799	552	-69	-12	-38	-2%	-1%	-6%
19.02	3,360	812	1,319	3,292	800	1,269	-39	-12	-50	-1%	-1%	-4%
19.03	3,428	954	628	3,326	931	593	-108	-23	-35	-3%	-2%	-6%
110.00	7,817	2,578	3,584	7,590	2,518	3,173	-240	-60	-411	-3%	-2%	-11%
111.01	4,525	1,295	791	4,422	1,273	752	-109	-22	-39	-2%	-2%	-5%
111.02	5,171	1,185	561	5,050	1,164	527	-125	-21	-34	-2%	-2%	-6%
112.00	4,534	1,602	2,435	6,280	2,254	2,573	1,752	652	138	39%	41%	6%
113.00	4,955	1,963	5,324	8,003	3,290	10,150	3,074	1,327	4,826	62%	68%	91%
114.01	2,514	799	2,733	2,407	766	2,669	-93	-33	-64	-4%	-4%	-2%
114.02	2,644	888	616	2,535	856	578	-110	-32	-38	-4%	-4%	-6%
114.03	6,466	1,921	2,574	6,329	1,886	2,494	-128	-35	-80	-2%	-2%	-3%
115.02	4,712	1,529	2,235	4,529	1,478	2,151	-188	-51	-84	-4%	-3%	-4%
115.03	2,034	590	689	2,001	580	638	-29	-10	-51	-1%	-2%	-7%
115.04	6,118	2,606	6,853	6,029	2,585	6,615	-11	-21	-238	0%	-1%	-3%
116.01	9,390	2,376	2,088	12,747	3,248	4,494	3,341	872	2,406	36%	37%	115%

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2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
116.02	6,591	1,623	22,104	7,815	1,982	21,869	1,216	359	-235	18%	22%	-1%
117.07	5,791	2,280	2,171	5,668	2,245	2,069	-134	-35	-102	-2%	-2%	-5%
117.08	5,037	1,909	735	4,942	1,884	714	-96	-25	-21	-2%	-1%	-3%
117.09	5,095	1,506	3,899	4,961	1,475	3,498	-135	-31	-401	-3%	-2%	-10%
117.10	4,103	1,192	1,007	3,994	1,167	933	-105	-25	-74	-3%	-2%	-7%
117.11	8,204	2,624	1,498	8,085	2,594	1,431	-124	-30	-67	-2%	-1%	-4%
117.12	5,522	1,635	1,336	5,811	1,732	1,450	288	97	114	5%	6%	9%
117.14	654	391	39,730	846	503	34,081	192	112	-5,649	29%	29%	-14%
117.15	8,351	2,592	1,973	7,877	2,459	1,907	-475	-133	-66	-6%	-5%	-3%
117.16	5,542	1,684	675	5,427	1,659	669	-117	-25	-6	-2%	-1%	-1%
117.17	3,110	950	930	2,981	916	906	-130	-34	-24	-4%	-4%	-3%
117.18	3,882	1,141	748	3,761	1,111	714	-123	-30	-34	-3%	-3%	-5%
117.20	8,779	1,526	2,727	8,550	1,495	2,664	-231	-31	-63	-3%	-2%	-2%
117.21	5,426	1,535	910	7,003	1,993	1,583	1,575	458	673	29%	30%	74%
117.22	6,729	2,508	4,011	3,430	1,286	4,069	-3,300	-1,222	58	-49%	-49%	1%
218.02	8,340	2,741	3,791	7,949	2,628	3,627	-392	-113	-164	-5%	-4%	-4%
218.07	4,597	1,347	642	4,563	1,345	642	-34	-2	0	-1%	0%	0%
218.09	3,362	1,019	954	3,230	984	951	-130	-35	-3	-4%	-3%	0%
218.10	4,246	1,265	1,408	4,108	1,231	1,368	-139	-34	-40	-3%	-3%	-3%
218.12	7,490	2,274	1,230	7,249	2,214	1,212	-241	-60	-18	-3%	-3%	-1%
218.13	47	13	20,375	219	62	20,283	172	49	-92	366%	377%	0%
218.14	8,621	2,877	7,107	8,082	2,722	6,914	-543	-155	-193	-6%	-5%	-3%
218.15	17,072	5,368	4,014	15,854	5,001	3,815	-1,377	-366	-199	-8%	-7%	-5%
218.16	5,526	1,826	695	5,349	1,778	693	-177	-48	-2	-3%	-3%	0%
218.17	4,072	1,308	350	3,998	1,292	350	-74	-16	0	-2%	-1%	0%
218.20	5,210	1,529	480	4,949	1,461	437	-262	-68	-43	-5%	-4%	-9%
218.21	8,117	2,778	5,175	7,441	2,561	5,107	-678	-217	-68	-8%	-8%	-1%
218.22	6,900	2,554	1,044	6,553	2,440	1,018	-347	-114	-26	-5%	-4%	-2%
218.23	4,163	1,349	340	3,980	1,297	327	-182	-52	-13	-4%	-4%	-4%
218.24	3,215	859	710	3,196	859	704	-19	0	-6	-1%	0%	-1%
218.25	3,920	1,210	288	3,836	1,191	274	-84	-19	-14	-2%	-2%	-5%
218.26	2,964	1,081	2,412	2,857	1,048	2,404	-107	-33	-8	-4%	-3%	0%
218.27	3,367	1,094	304	3,252	1,063	298	-115	-31	-6	-3%	-3%	-2%
218.28	5,313	1,345	531	5,215	1,328	527	-98	-17	-4	-2%	-1%	-1%
218.29	6,616	1,825	719	6,483	1,799	712	-133	-26	-7	-2%	-1%	-1%
218.30	6,851	1,994	906	6,804	1,992	877	-47	-2	-29	-1%	0%	-3%
219.03	4,655	1,228	2,810	4,443	1,179	2,810	-212	-49	0	-5%	-4%	0%
219.05	6,305	1,797	2,037	6,247	1,791	2,037	-58	-6	0	-1%	0%	0%
219.12	9,603	2,689	773	9,454	2,663	766	-159	-25	-8	-2%	-1%	-1%
219.13	9,477	1,987	750	9,373	1,977	743	-122	-10	-7	-1%	-1%	-1%
219.14	4,799	1,344	1,012	4,746	1,337	1,003	-63	-7	-9	-1%	-1%	-1%
219.15	4,683	1,492	921	4,633	1,485	917	-50	-7	-4	-1%	0%	0%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
219.16	4,251	1,424	620	4,209	1,419	620	-38	-5	0	-1%	0%	0%
219.17	4,194	1,298	666	4,134	1,287	648	-66	-11	-18	-2%	-1%	-3%
219.18	5,620	1,817	1,264	5,562	1,805	1,245	-65	-12	-19	-1%	-1%	-2%
219.19	3,196	1,063	1,073	3,168	1,060	1,073	-27	-3	0	-1%	0%	0%
219.20	6,217	2,086	652	6,169	2,082	648	-47	-4	-4	-1%	0%	-1%
219.21	5,317	1,427	709	5,282	1,426	709	-35	-1	0	-1%	0%	0%
219.22	5,483	2,221	4,026	5,433	2,214	4,026	-50	-7	0	-1%	0%	0%
219.23	7,132	2,336	581	6,993	2,304	581	-139	-32	0	-2%	-1%	0%
219.24	17,020	5,851	5,027	14,986	5,211	5,000	-2,031	-640	-27	-12%	-11%	-1%
320.02	6,582	2,068	779	6,529	2,062	779	-52	-6	0	-1%	0%	0%
320.03	5,389	1,576	1,661	5,355	1,576	1,661	-28	0	0	-1%	0%	0%
320.11	1,860	753	165	1,845	751	161	-17	-2	-4	-1%	0%	-2%
320.12	3,987	1,277	1,294	3,963	1,277	1,294	-23	0	0	-1%	0%	0%
320.13	6,179	1,824	5,790	6,740	2,010	5,790	577	186	0	9%	10%	0%
320.14	6,393	1,939	2,617	6,404	1,927	2,617	-9	-12	0	0%	-1%	0%
320.15	7,307	1,968	1,806	7,244	1,964	1,806	-11	-4	0	0%	0%	0%
320.20	6,540	1,894	1,285	6,498	1,893	1,284	-49	-1	-1	-1%	0%	0%
320.22	6,911	2,215	9,545	7,424	2,394	9,417	507	179	-128	7%	8%	-1%
320.23	27,058	7,627	12,140	12,543	3,555	5,615	-14,511	-4,072	-6,525	-54%	-53%	-54%
320.27	6,702	2,038	1,436	6,646	2,033	1,369	-57	-5	-67	-1%	0%	-5%
320.28	3,719	1,445	5,716	3,687	1,441	5,707	-35	-4	-9	-1%	0%	0%
320.29	4,833	1,477	580	4,751	1,460	531	-79	-17	-49	-2%	-1%	-8%
320.30	4,105	1,251	643	4,080	1,251	643	-28	0	0	-1%	0%	0%
320.31	4,065	1,164	903	4,027	1,160	903	-43	-4	0	-1%	0%	0%
320.32	3,534	1,035	483	3,513	1,035	483	-23	0	0	-1%	0%	0%
320.33	3,830	1,475	303	3,797	1,471	303	-38	-4	0	-1%	0%	0%
320.34	7,131	1,842	475	7,077	1,839	474	-61	-3	-1	-1%	0%	0%
320.35	2,644	1,017	1,006	2,620	1,014	1,006	-25	-3	0	-1%	0%	0%
320.36	3,890	1,226	919	3,863	1,225	919	-24	-1	0	-1%	0%	0%
320.37	5,352	2,351	693	5,304	2,344	693	-55	-7	0	-1%	0%	0%
320.38	7,831	2,120	1,340	7,774	2,117	1,336	-66	-3	-4	-1%	0%	0%
320.39	7,763	2,226	779	7,698	2,220	779	-74	-6	0	-1%	0%	0%
320.40	3,221	899	193	3,202	899	193	-23	0	0	-1%	0%	0%
320.41	2,116	647	333	1,562	444	323	-509	-203	-10	-24%	-31%	-3%
320.42	8,288	2,082	627	7,634	1,928	622	-652	-154	-5	-8%	-7%	-1%
320.43	4,660	1,242	331	4,617	1,238	311	-43	-4	-20	-1%	0%	-6%
320.44	6,276	1,958	900	6,217	1,951	886	-57	-7	-14	-1%	0%	-2%
320.45	2,956	921	200	2,939	921	200	-16	0	0	-1%	0%	0%
320.46	5,791	1,763	521	5,737	1,757	521	-52	-6	0	-1%	0%	0%
320.47	4,537	1,941	1,042	3,934	1,693	1,040	-607	-248	-2	-13%	-13%	0%
320.48	6,492	2,243	263	6,439	2,238	262	-57	-5	-1	-1%	0%	0%
320.49	10,689	3,169	333	10,094	3,010	327	-628	-159	-6	-6%	-5%	-2%

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320.50	5,743	1,730	609	5,702	1,728	567	-41	-2	-42	-1%	0%	-7%
320.51	5,143	1,996	663	5,097	1,990	655	-46	-6	-8	-1%	0%	-1%
320.52	29,769	9,136	5,408	29,034	8,963	5,078	-730	-173	-330	-2%	-2%	-6%
320.53	8,848	3,054	6,524	8,773	3,046	6,192	-75	-8	-332	-1%	0%	-5%
320.54	5,512	2,137	1,548	5,461	2,130	1,405	-51	-7	-143	-1%	0%	-9%
320.55	4,710	1,504	369	4,676	1,502	365	-34	-2	-4	-1%	0%	-1%
320.56	39,285	10,483	11,216	21,010	5,641	6,432	-18,263	-4,842	-4,784	-46%	-46%	-43%
421.03	9,305	3,213	2,400	9,055	3,145	2,300	-250	-68	-100	-3%	-2%	-4%
421.06	2,135	927	5,305	7,023	3,172	11,433	4,887	2,245	6,128	229%	242%	116%
421.07	5,746	1,639	3,111	9,302	2,672	4,604	3,556	1,033	1,493	62%	63%	48%
421.08	7,365	2,911	4,332	7,220	2,870	4,249	-145	-41	-83	-2%	-1%	-2%
421.09	6,773	2,421	6,483	5,826	2,095	6,095	-947	-326	-388	-14%	-13%	-6%
421.11	9,259	2,660	632	9,052	2,616	593	-206	-44	-39	-2%	-2%	-6%
421.12	7,587	2,263	1,742	7,445	2,234	1,686	-142	-29	-56	-2%	-1%	-3%
421.13	5,469	1,854	2,172	5,316	1,810	2,053	-154	-44	-119	-3%	-2%	-5%
421.14	4,578	1,608	1,255	4,446	1,571	1,150	-132	-37	-105	-3%	-2%	-8%
422.01	6,931	2,601	6,348	6,734	2,542	6,033	-198	-59	-315	-3%	-2%	-5%
422.03	10,025	3,767	1,366	9,826	3,713	1,291	-208	-54	-75	-2%	-1%	-5%
422.05	8,246	2,363	2,701	7,967	2,296	2,580	-276	-67	-121	-3%	-3%	-4%
422.06	4,035	1,470	1,292	3,929	1,430	1,215	-95	-40	-77	-2%	-3%	-6%
423.05	4,308	1,729	2,776	4,236	1,709	2,707	-73	-20	-69	-2%	-1%	-2%
423.07	8,525	2,299	3,083	8,352	2,264	3,010	-147	-35	-73	-2%	-2%	-2%
423.10	10,131	3,181	2,967	10,124	3,189	2,824	-3	8	-143	0%	0%	-5%
423.11	7,040	2,266	2,154	6,869	2,224	2,013	-170	-42	-141	-2%	-2%	-7%
423.12	9,658	2,172	8,054	15,875	3,545	9,319	6,228	1,373	1,265	64%	63%	16%
423.13	8,179	2,991	5,141	8,071	2,969	4,689	-113	-22	-452	-1%	-1%	-9%
423.15	6,715	2,186	3,879	8,165	2,676	3,848	1,449	490	-31	22%	22%	-1%
423.17	4,111	1,326	1,197	4,076	1,322	1,189	-16	-4	-8	0%	0%	-1%
423.19	3,869	1,139	2,354	3,825	1,133	2,344	-35	-6	-10	-1%	-1%	0%
423.20	5,945	2,559	6,355	5,847	2,532	6,165	-97	-27	-190	-2%	-1%	-3%
423.23	5,616	2,535	2,685	5,413	2,458	2,569	-207	-77	-116	-4%	-3%	-4%
423.24	4,918	2,191	717	4,791	2,147	688	-126	-44	-29	-3%	-2%	-4%
423.25	4,087	1,524	1,453	4,041	1,516	1,280	-49	-8	-173	-1%	-1%	-12%
423.26	5,108	1,766	767	5,060	1,760	760	-49	-6	-7	-1%	0%	-1%
423.27	5,423	1,745	1,621	5,329	1,725	1,431	-83	-20	-190	-2%	-1%	-12%
423.28	2,898	796	2,040	2,870	793	1,995	-21	-3	-45	-1%	0%	-2%
423.29	5,096	1,565	857	5,054	1,559	852	-39	-6	-5	-1%	0%	-1%
423.30	7,149	2,165	690	7,084	2,158	686	-70	-7	-4	-1%	0%	-1%
423.31	6,110	2,049	694	6,056	2,043	689	-58	-6	-5	-1%	0%	-1%
423.32	6,314	2,154	1,047	6,250	2,145	1,030	-68	-9	-17	-1%	0%	-2%
423.33	5,034	1,336	5,920	5,791	1,546	4,989	765	210	-931	15%	16%	-16%
423.34	5,865	2,187	1,760	5,814	2,181	1,739	-55	-6	-21	-1%	0%	-1%

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423.35	6,364	2,405	331	6,305	2,397	319	-63	-8	-12	-1%	0%	-4%
423.36	5,119	1,545	945	5,079	1,542	934	-42	-3	-11	-1%	0%	-1%
423.37	4,353	1,373	630	4,305	1,366	619	-51	-7	-11	-1%	-1%	-2%
423.38	5,418	1,946	1,151	5,336	1,928	1,125	-85	-18	-26	-2%	-1%	-2%
423.39	3,962	1,449	844	3,852	1,417	835	-113	-32	-9	-3%	-2%	-1%
524.04	10,670	4,134	30,765	12,861	5,073	25,946	2,396	938	-4,819	22%	23%	-16%
524.08	6,670	2,136	13,295	6,584	2,121	12,693	-82	-15	-602	-1%	-1%	-5%
524.10	5,782	2,207	25,942	12,176	4,689	31,748	6,396	2,482	5,806	111%	112%	22%
524.11	5,365	1,346	3,518	5,277	1,331	3,491	-92	-15	-27	-2%	-1%	-1%
524.15	4,271	1,306	1,912	4,246	1,306	1,820	-23	0	-92	-1%	0%	-5%
524.16	4,217	1,258	1,034	4,185	1,256	1,001	-31	-2	-33	-1%	0%	-3%
524.17	8,985	2,622	1,194	8,901	2,613	1,162	-78	-9	-32	-1%	0%	-3%
524.18	21,738	9,070	31,734	20,449	8,583	10,922	-1,273	-487	-20,812	-6%	-5%	-66%
524.19	3,619	1,133	239	3,598	1,133	230	-20	0	-9	-1%	0%	-4%
524.20	30,146	10,847	3,798	29,867	10,810	3,743	-262	-37	-55	-1%	0%	-1%
524.21	11,590	3,815	1,368	11,482	3,802	1,343	-102	-13	-25	-1%	0%	-2%
524.22	4,393	1,463	26,882	4,367	1,463	26,036	-23	0	-846	-1%	0%	-3%
524.23	5,846	2,105	2,614	5,764	2,088	2,606	-79	-17	-8	-1%	-1%	0%
524.24	5,126	1,840	676	5,078	1,827	622	-49	-13	-54	-1%	-1%	-8%
524.25	6,300	2,317	1,992	6,206	2,296	1,897	-90	-21	-95	-1%	-1%	-5%
524.26	23,486	9,404	2,292	21,829	8,794	1,448	-1,655	-610	-844	-7%	-6%	-37%
524.27	5,358	1,728	6,618	5,317	1,722	6,456	-41	-6	-162	-1%	0%	-2%
524.28	6,730	2,181	2,191	6,653	2,165	1,647	-77	-16	-544	-1%	-1%	-25%
525.02	6,764	2,004	10,276	8,557	2,552	11,128	1,795	548	852	27%	27%	8%
525.05	5,853	1,907	664	5,809	1,904	664	-40	-3	0	-1%	0%	0%
525.06	2,903	821	597	2,886	821	597	-15	0	0	-1%	0%	0%
525.11	6,604	2,193	3,520	6,547	2,187	3,515	-52	-6	-5	-1%	0%	0%
525.13	6,517	2,307	2,169	6,459	2,300	2,169	-53	-7	0	-1%	0%	0%
525.14	6,130	2,056	899	6,076	2,050	899	-50	-6	0	-1%	0%	0%
525.15	8,900	3,059	1,136	8,821	3,050	734	-73	-9	-402	-1%	0%	-35%
525.17	10,040	3,934	13,139	9,948	3,921	8,948	-85	-13	-4,191	-1%	0%	-32%
525.18	6,058	3,113	35,254	8,812	4,555	36,478	2,758	1,442	1,224	46%	46%	3%
525.19	4,863	1,605	246	4,819	1,600	241	-40	-5	-5	-1%	0%	-2%
525.20	4,068	1,307	559	4,028	1,302	559	-37	-5	0	-1%	0%	0%
525.21	5,226	2,111	3,773	5,178	2,104	3,722	-44	-7	-51	-1%	0%	-1%
525.22	4,743	1,417	272	4,702	1,413	272	-38	-4	0	-1%	0%	0%
525.23	4,783	1,487	473	4,745	1,484	473	-35	-3	0	-1%	0%	0%
525.24	8,047	2,905	3,944	7,972	2,895	3,898	-73	-10	-46	-1%	0%	-1%
525.25	20,322	5,937	2,805	20,145	5,919	2,323	-162	-18	-482	-1%	0%	-17%
525.26	5,103	1,336	1,844	5,073	1,336	1,838	-26	0	-6	-1%	0%	0%
525.27	9,472	2,677	4,768	15,698	4,463	5,151	6,233	1,786	383	66%	67%	8%
525.28	3,935	1,221	816	3,905	1,219	811	-27	-2	-5	-1%	0%	-1%

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626.04	20,993	7,737	6,433	19,303	7,141	10,699	-1,680	-594	4,266	-8%	-8%	66%
626.05	3,856	1,963	5,922	3,798	1,945	5,868	-54	-18	-54	-1%	-1%	-1%
626.10	18,002	8,211	83,473	15,137	6,325	73,913	-2,863	-1,886	-9,560	-16%	-23%	-11%
626.11	4,423	1,639	4,064	4,383	1,634	4,062	-37	-5	-2	-1%	0%	0%
626.12	8,282	2,735	694	8,206	2,726	692	-70	-9	-2	-1%	0%	0%
626.14	12,789	2,224	19,087	12,617	2,219	16,086	-315	-5	-3,001	-2%	0%	-16%
626.19	4,592	1,903	1,564	4,524	1,886	1,476	-64	-17	-88	-1%	-1%	-6%
626.20	5,828	2,445	831	5,748	2,426	800	-82	-19	-31	-1%	-1%	-4%
626.21	15,799	6,243	19,445	10,607	3,952	12,788	-5,179	-2,291	-6,657	-33%	-37%	-34%
626.22	4,995	2,906	10,514	4,740	2,774	9,705	-255	-132	-809	-5%	-5%	-8%
626.23	7,443	4,343	2,672	7,252	4,255	2,534	-194	-88	-138	-3%	-2%	-5%
626.25	5,358	2,160	458	5,287	2,144	435	-66	-16	-23	-1%	-1%	-5%
626.26	3,158	1,018	1,087	3,130	1,015	522	-26	-3	-565	-1%	0%	-52%
626.27	3,594	1,426	1,360	3,586	1,422	1,360	-5	-4	0	0%	0%	0%
626.28	3,975	998	981	3,934	995	873	-52	-3	-108	-1%	0%	-11%
626.29	3,183	901	254	3,153	898	254	-28	-3	0	-1%	0%	0%
626.30	2,308	870	690	2,265	859	687	-41	-11	-3	-2%	-1%	0%
626.31	4,191	1,254	728	4,153	1,250	727	-35	-4	-1	-1%	0%	0%
626.32	4,610	1,994	1,957	4,521	1,967	1,731	-92	-27	-226	-2%	-1%	-12%
626.33	5,223	1,716	575	5,174	1,710	569	-54	-6	-6	-1%	0%	-1%
626.34	5,785	2,033	3,965	5,734	2,027	3,940	-57	-6	-25	-1%	0%	-1%
626.35	4,372	1,709	144	4,305	1,693	143	-21	-16	-1	0%	-1%	-1%
626.36	3,807	1,483	385	3,774	1,479	378	-37	-4	-7	-1%	0%	-2%
626.37	5,387	2,224	3,290	5,338	2,217	3,144	-54	-7	-146	-1%	0%	-4%
626.38	6,177	2,686	3,029	6,120	2,677	3,024	-63	-9	-5	-1%	0%	0%
626.39	6,595	2,449	814	6,537	2,442	755	-65	-7	-59	-1%	0%	-7%
626.40	3,652	1,654	1,482	3,619	1,649	1,466	-37	-5	-16	-1%	0%	-1%
626.41	6,860	1,989	1,502	6,686	1,950	1,438	-180	-39	-64	-3%	-2%	-4%
626.42	3,346	1,307	521	3,311	1,302	517	-5	-5	-4	0%	0%	-1%
626.43	5,960	2,002	1,351	5,871	1,984	1,167	-92	-18	-184	-2%	-1%	-14%
626.44	8,371	3,056	1,286	8,289	3,044	1,274	-87	-12	-12	-1%	0%	-1%
626.45	6,564	2,404	695	6,501	2,395	690	-67	-9	-5	-1%	0%	-1%
626.46	4,374	2,876	1,119	4,292	2,839	984	-84	-37	-135	-2%	-1%	-12%
626.47	5,113	2,621	6,411	4,713	2,387	6,334	-473	-234	-77	-9%	-9%	-1%
627.01	3,091	1,536	1,793	2,997	1,498	1,777	-96	-38	-16	-3%	-2%	-1%
627.02	5,147	2,668	1,508	4,789	2,497	1,496	-360	-171	-12	-7%	-6%	-1%
628.00	4,875	2,678	1,679	4,698	2,596	1,673	-180	-82	-6	-4%	-3%	0%
629.00	1,872	848	467	1,848	842	464	-25	-6	-3	-1%	-1%	-1%
630.04	6,149	3,046	1,897	6,093	3,036	1,789	-60	-10	-108	-1%	0%	-6%
630.05	1,507	807	578	1,559	840	546	51	33	-32	3%	4%	-6%
630.06	3,316	1,826	1,045	3,135	1,736	1,030	-183	-90	-15	-6%	-5%	-1%
630.07	7,058	2,874	2,117	6,992	2,864	2,101	-70	-10	-16	-1%	0%	-1%

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630.08	1,763	992	17,167	1,617	915	16,953	-147	-77	-214	-8%	-8%	-1%
630.09	1,771	740	2,074	1,753	737	2,051	-19	-3	-23	-1%	0%	-1%
630.10	6,859	3,092	2,108	6,583	2,985	2,104	-279	-107	-4	-4%	-3%	0%
631.01	2,926	1,220	2,535	2,918	1,221	2,504	-2	1	-31	0%	0%	-1%
631.02	7,028	2,755	1,121	6,948	2,730	1,087	-94	-25	-34	-1%	-1%	-3%
631.03	2,900	1,119	482	2,776	1,077	477	-123	-42	-5	-4%	-4%	-1%
632.01	4,139	1,651	908	3,971	1,593	899	-178	-58	-9	-4%	-4%	-1%
632.02	3,941	1,485	1,763	3,842	1,456	1,758	-105	-29	-5	-3%	-2%	0%
633.01	3,317	1,490	2,418	3,417	1,544	2,382	91	54	-36	3%	4%	-1%
633.02	4,545	1,753	1,915	4,395	1,705	1,873	-161	-48	-42	-4%	-3%	-2%
634.00	5,436	2,165	4,909	5,191	2,079	4,768	-243	-86	-141	-4%	-4%	-3%
635.00	6,739	3,141	4,281	6,383	2,992	4,264	-356	-149	-17	-5%	-5%	0%
636.01	4,163	1,408	1,379	4,038	1,372	1,335	-135	-36	-44	-3%	-3%	-3%
636.03	9,776	4,462	7,662	7,393	3,321	6,972	-2,375	-1,141	-690	-24%	-26%	-9%
636.04	4,447	1,430	5,990	4,408	1,426	5,541	-54	-4	-449	-1%	0%	-7%
636.05	6,298	1,419	3,441	6,586	1,490	3,381	280	71	-60	4%	5%	-2%
637.01	7,530	1,693	1,535	7,456	1,687	1,511	-66	-6	-24	-1%	0%	-2%
637.02	6,315	2,244	3,545	7,882	2,832	5,475	1,568	588	1,930	25%	26%	54%
638.02	3,293	1,073	1,715	3,416	1,120	1,726	115	47	11	3%	4%	1%
638.03	5,350	1,718	439	5,152	1,661	435	-211	-57	-4	-4%	-3%	-1%
638.05	2,621	898	437	2,584	890	434	-44	-8	-3	-2%	-1%	-1%
638.06	4,127	1,430	950	4,048	1,411	948	-91	-19	-2	-2%	-1%	0%
638.07	6,275	2,086	3,899	7,512	2,522	4,380	1,320	436	481	21%	21%	12%
638.08	7,739	1,606	540	7,494	1,563	535	-218	-43	-5	-3%	-3%	-1%
639.02	7,558	2,662	5,516	8,116	2,883	5,939	538	221	423	7%	8%	8%
639.03	4,660	1,191	1,759	4,500	1,156	1,737	-166	-35	-22	-4%	-3%	-1%
639.04	5,556	1,332	2,693	5,521	1,332	2,680	-38	0	-13	-1%	0%	0%
639.05	4,796	1,843	936	5,104	1,974	937	296	131	1	6%	7%	0%
639.06	7,749	2,395	1,707	7,762	2,414	1,610	96	19	-97	1%	1%	-6%
639.07	8,370	3,632	37,692	9,401	4,329	41,064	1,005	697	3,372	12%	19%	9%
639.08	6,429	2,575	5,917	6,270	2,524	6,001	-176	-51	84	-3%	-2%	1%
740.03	6,474	1,825	24,636	6,315	1,790	24,390	-253	-35	-246	-4%	-2%	-1%
740.04	8,152	2,106	563	8,088	2,102	563	-68	-4	0	-1%	0%	0%
740.05	8,657	1,470	1,440	10,043	1,717	1,695	1,421	247	255	16%	17%	18%
740.06	6,214	1,915	1,098	6,158	1,909	1,098	-58	-6	0	-1%	0%	0%
741.02	8,191	1,292	796	8,504	1,350	823	298	58	27	4%	4%	3%
741.03	5,745	914	1,330	5,692	911	1,330	-57	-3	0	-1%	0%	0%
741.06	6,107	1,855	17,104	6,050	1,849	17,127	-70	-6	23	-1%	0%	0%
741.07	6,070	2,776	3,411	5,615	2,583	3,378	-457	-193	-33	-8%	-7%	-1%
741.08	5,863	880	7,461	5,958	898	7,461	89	18	0	2%	2%	0%
741.09	4,462	658	753	4,422	656	753	-43	-2	0	-1%	0%	0%
741.10	4,305	944	110	4,279	944	110	-30	0	0	-1%	0%	0%

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741.11	6,661	1,363	1,683	7,221	1,487	1,796	552	124	113	8%	9%	7%
742.00	10,082	1,730	887	11,699	2,020	1,233	1,611	290	346	16%	17%	39%
743.00	4,649	786	215	4,604	783	215	-47	-3	0	-1%	0%	0%
744.03	6,930	1,302	24,202	6,889	1,302	25,994	-43	0	1,792	-1%	0%	7%
744.05	9,713	1,779	2,122	13,667	2,532	2,582	3,983	753	460	41%	42%	22%
744.06	5,106	1,011	6,107	5,264	1,050	6,190	130	39	83	3%	4%	1%
744.07	8,558	1,816	550	8,475	1,809	542	-83	-7	-8	-1%	0%	-1%
744.08	6,075	1,604	1,015	6,024	1,600	1,007	-50	-4	-8	-1%	0%	-1%
745.01	8,659	1,365	500	8,583	1,361	500	-78	-4	0	-1%	0%	0%
745.02	6,606	1,007	321	6,567	1,007	323	-41	0	2	-1%	0%	1%
746.01	9,315	1,653	970	11,371	2,033	1,430	2,041	380	460	22%	23%	47%
746.02	10,143	1,670	393	10,294	1,705	433	148	35	40	1%	2%	10%
747.01	9,546	1,402	245	9,456	1,397	245	-93	-5	0	-1%	0%	0%
747.02	7,044	1,089	861	8,204	1,276	1,076	1,158	187	215	16%	17%	25%
748.01	6,640	993	739	6,593	992	739	-69	-1	0	-1%	0%	0%
748.02	6,411	1,092	1,991	6,349	1,088	1,991	-90	-4	0	-1%	0%	0%
748.03	9,946	1,800	1,317	9,876	1,798	1,317	-74	-2	0	-1%	0%	0%
748.05	7,115	1,113	234	7,047	1,109	234	-70	-4	0	-1%	0%	0%
748.06	6,534	907	267	6,495	907	267	-44	0	0	-1%	0%	0%
749.01	10,676	1,901	2,499	10,601	1,899	2,499	-83	-2	0	-1%	0%	0%
749.02	7,640	1,178	385	7,569	1,174	385	-76	-4	0	-1%	0%	0%
750.02	11,555	2,522	15,304	18,967	4,197	23,149	7,396	1,675	7,845	64%	66%	51%
750.03	9,093	1,750	3,120	11,204	2,170	3,120	2,109	420	0	23%	24%	0%
750.04	6,163	1,302	1,259	6,475	1,377	1,335	299	75	76	5%	6%	6%
751.00	11,583	1,991	5,113	13,169	2,244	5,340	1,979	253	227	17%	13%	4%
752.01	6,335	1,095	1,297	6,298	1,095	1,271	-39	0	-26	-1%	0%	-2%
752.02	6,501	1,166	3,064	6,439	1,162	3,064	-83	-4	0	-1%	0%	0%
753.01	6,625	1,719	755	6,599	1,713	755	-8	-6	0	0%	0%	0%
753.02	5,185	1,110	1,839	5,147	1,106	1,839	-31	-4	0	-1%	0%	0%
753.03	4,267	1,302	1,595	4,229	1,298	1,669	-51	-4	74	-1%	0%	5%
754.01	4,326	1,252	685	4,355	1,268	1,060	28	16	375	1%	1%	55%
754.03	7,916	2,644	11,763	11,122	3,771	13,138	3,202	1,127	1,375	40%	43%	12%
754.04	6,817	2,118	2,397	7,619	2,382	3,015	797	264	618	12%	12%	26%
754.05	3,004	975	2,247	3,014	972	2,246	35	-3	-1	1%	0%	0%
755.04	4,613	1,601	6,480	4,577	1,598	6,399	-35	-3	-81	-1%	0%	-1%
755.05	4,133	1,423	6,388	4,091	1,417	6,316	-41	-6	-72	-1%	0%	-1%
755.06	3,650	1,193	1,546	3,628	1,193	1,528	-21	0	-18	-1%	0%	-1%
755.07	6,593	2,072	1,454	6,487	2,051	1,433	-105	-21	-21	-2%	-1%	-1%
755.12	4,080	1,162	424	4,042	1,158	414	-37	-4	-10	-1%	0%	-2%
755.13	5,429	1,524	316	5,379	1,519	306	-49	-5	-10	-1%	0%	-3%
755.14	4,558	1,230	497	4,517	1,226	487	-42	-4	-10	-1%	0%	-2%
755.15	22,738	8,442	130,796	25,159	9,574	129,084	2,416	1,132	-1,711	11%	13%	-1%

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756.03	4,031	1,442	754	3,996	1,438	744	-34	-4	-10	-1%	0%	-1%
756.04	8,269	2,654	1,171	8,146	2,630	1,128	-128	-24	-43	-2%	-1%	-4%
756.05	6,566	2,178	1,136	6,494	2,167	1,132	-81	-11	-4	-1%	-1%	0%
756.06	7,317	2,194	725	7,240	2,184	692	-90	-10	-33	-1%	0%	-5%
756.07	6,567	2,869	594	6,510	2,861	576	-56	-8	-18	-1%	0%	-3%
757.01	7,216	2,199	2,352	7,156	2,194	2,335	-67	-5	-17	-1%	0%	-1%
757.02	3,331	1,123	1,216	3,313	1,123	1,194	-38	0	-22	-1%	0%	-2%
757.03	4,149	1,375	911	4,114	1,371	883	-34	-4	-28	-1%	0%	-3%
758.05	4,602	1,410	1,901	4,552	1,403	1,817	-57	-7	-84	-1%	0%	-4%
758.06	6,712	2,140	1,617	6,644	2,131	1,576	-80	-9	-41	-1%	0%	-3%
758.07	5,327	1,251	1,390	5,276	1,246	1,375	-51	-5	-15	-1%	0%	-1%
758.08	3,594	1,147	415	3,548	1,139	410	-51	-8	-5	-1%	-1%	-1%
758.09	3,428	1,090	1,595	3,308	1,058	1,586	-122	-32	-9	-4%	-3%	-1%
758.10	3,371	1,049	368	3,243	1,015	363	-127	-34	-5	-4%	-3%	-1%
758.11	3,764	809	1,004	3,885	840	956	113	31	-48	3%	4%	-5%
758.12	7,647	1,951	2,471	8,228	2,112	3,483	566	161	1,012	7%	8%	41%
758.13	6,173	1,801	1,749	6,389	1,876	3,084	206	75	1,335	3%	4%	76%
758.14	4,025	1,166	191	3,967	1,156	182	-67	-10	-9	-2%	-1%	-5%
758.15	5,583	1,621	281	5,526	1,614	277	-68	-7	-4	-1%	0%	-1%
758.16	4,270	1,222	1,727	4,186	1,205	1,692	-92	-17	-35	-2%	-1%	-2%
759.01	5,314	1,741	4,270	10,913	3,616	8,670	5,591	1,875	4,400	105%	108%	103%
759.02	7,939	2,814	1,524	9,829	3,526	3,049	1,885	712	1,525	24%	25%	100%
760.00	12,216	4,123	26,253	12,627	4,235	25,036	338	112	-1,217	3%	3%	-5%
761.01	17,110	7,555	19,802	13,217	6,431	25,153	-3,912	-1,124	5,351	-23%	-15%	27%
761.02	9,644	2,483	17,982	4,798	1,843	17,008	-4,688	-640	-974	-49%	-26%	-5%
761.03	9,682	2,410	1,649	9,588	2,401	1,603	-105	-9	-46	-1%	0%	-3%
762.01	8,220	2,489	1,106	8,145	2,481	1,092	-91	-8	-14	-1%	0%	-1%
762.02	6,541	1,988	1,980	6,476	1,980	1,961	-74	-8	-19	-1%	0%	-1%
762.04	6,692	1,432	35,371	9,555	2,035	36,212	2,855	603	841	43%	42%	2%
762.05	7,665	1,838	1,199	8,128	1,987	2,219	508	149	1,020	7%	8%	85%
762.06	5,057	1,611	2,421	6,414	2,058	3,686	1,347	447	1,265	27%	28%	52%
762.08	5,551	1,689	3,314	6,839	2,098	4,046	1,279	409	732	23%	24%	22%
863.01	8,094	1,790	2,270	8,196	1,822	2,260	100	32	-10	1%	2%	0%
863.03	17,876	8,519	33,131	16,923	7,333	37,907	-952	-1,186	4,776	-5%	-14%	14%
863.04	5,458	1,794	1,000	5,130	1,696	1,000	-328	-98	0	-6%	-5%	0%
863.05	4,217	1,130	438	4,181	1,127	438	-36	-3	0	-1%	0%	0%
863.06	4,039	1,270	675	4,002	1,266	675	-37	-4	0	-1%	0%	0%
864.02	6,031	1,383	731	5,982	1,380	731	-49	-3	0	-1%	0%	0%
864.04	7,056	1,496	677	6,991	1,491	680	-65	-5	3	-1%	0%	0%
864.05	7,992	1,781	1,315	7,917	1,775	1,356	-74	-6	41	-1%	0%	3%
864.06	6,895	2,031	414	4,592	1,359	416	-2,303	-672	2	-33%	-33%	0%
864.07	6,805	2,061	1,199	6,745	2,055	1,199	-60	-6	0	-1%	0%	0%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
865.01	5,414	1,146	2,504	6,208	1,322	2,643	794	176	139	15%	15%	6%
865.02	7,550	1,376	1,736	7,483	1,372	1,806	-67	-4	70	-1%	0%	4%
866.01	11,292	2,322	2,325	13,613	2,824	2,812	2,319	502	487	21%	22%	21%
866.02	6,985	1,733	1,787	7,313	1,823	2,026	325	90	239	5%	5%	13%
867.01	11,447	2,978	2,113	10,491	2,741	1,879	-957	-237	-234	-8%	-8%	-11%
867.02	9,538	2,354	748	7,566	1,877	748	-1,972	-477	0	-21%	-20%	0%
868.01	3,512	976	3,260	3,823	1,069	2,045	308	93	-1,215	9%	10%	-37%
868.02	8,438	2,025	1,616	7,980	1,926	1,975	-457	-99	359	-5%	-5%	22%
868.03	8,721	2,687	1,832	10,435	3,241	1,822	1,715	554	-10	20%	21%	-1%
869.01	10,125	2,671	1,160	10,086	2,664	1,160	-38	-7	0	0%	0%	0%
869.02	8,451	2,257	1,967	7,390	1,922	2,170	-1,080	-335	203	-13%	-15%	10%
869.03	8,606	2,488	632	6,695	1,946	794	-1,911	-542	162	-22%	-22%	26%
870.01	7,918	2,131	741	6,162	1,668	741	-1,756	-463	0	-22%	-22%	0%
870.02	7,753	2,294	737	7,539	2,244	738	-214	-50	1	-3%	-2%	0%
871.01	4,583	1,667	2,016	4,542	1,662	1,911	-41	-5	-105	-1%	0%	-5%
871.02	11,304	2,859	3,138	7,117	1,810	3,729	-4,187	-1,049	591	-37%	-37%	19%
871.03	8,563	2,336	1,400	8,503	2,330	1,400	-61	-6	0	-1%	0%	0%
871.05	10,165	2,846	1,609	5,134	1,432	2,193	-5,029	-1,414	584	-49%	-50%	36%
871.06	5,630	1,293	489	6,145	1,422	554	513	129	65	9%	10%	13%
872.00	8,202	2,532	2,173	9,118	2,837	2,360	918	305	187	11%	12%	9%
873.00	12,743	3,316	5,977	12,625	3,305	6,207	-117	-11	230	-1%	0%	4%
874.01	6,983	1,735	862	6,426	1,606	919	-557	-129	57	-8%	-7%	7%
874.03	6,683	1,391	385	5,438	1,134	1,511	-1,243	-257	1,126	-19%	-18%	292%
874.04	4,223	785	314	4,812	900	384	589	115	70	14%	15%	22%
874.05	8,894	1,808	2,784	9,894	2,022	3,049	997	214	265	11%	12%	10%
875.01	6,657	1,421	32,706	14,239	3,161	32,054	7,582	1,740	-652	114%	122%	-2%
875.03	8,008	1,858	5,034	14,311	3,343	5,017	6,302	1,485	-17	79%	80%	0%
875.04	9,643	1,979	1,046	9,723	2,007	1,029	80	28	-17	1%	1%	-2%
876.01	5,839	1,441	898	5,802	1,436	898	-40	-5	0	-1%	0%	0%
876.02	8,397	2,185	1,847	8,940	2,338	1,884	540	153	37	6%	7%	2%
877.01	5,329	1,587	1,258	5,284	1,583	1,227	-47	-4	-31	-1%	0%	-2%
877.03	6,316	1,405	507	9,789	2,197	1,101	3,452	792	594	55%	56%	117%
877.04	6,251	1,626	573	5,457	1,427	755	-794	-199	182	-13%	-12%	32%
878.01	5,936	1,708	1,160	5,801	1,679	1,136	-136	-29	-24	-2%	-2%	-2%
878.02	8,569	2,612	989	10,400	3,189	2,864	1,824	577	1,875	21%	22%	190%
878.03	8,856	1,761	2,825	8,829	1,766	3,274	-34	5	449	0%	0%	16%
878.05	8,227	2,111	1,408	9,234	2,391	1,753	1,020	280	345	12%	13%	25%
878.06	7,007	1,877	886	9,077	2,447	1,782	2,063	570	896	29%	30%	101%
879.01	4,494	1,301	1,181	6,143	1,790	1,853	1,645	489	672	37%	38%	57%
879.02	7,177	1,509	546	10,500	2,222	1,345	3,316	713	799	46%	47%	146%
880.01	5,348	1,263	400	5,266	1,251	379	-80	-12	-21	-1%	-1%	-5%
880.02	4,120	1,118	477	3,965	1,082	448	-157	-36	-29	-4%	-3%	-6%

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2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
881.01	2,500	746	15,790	2,480	722	15,530	-20	-24	-260	-1%	-3%	-2%
881.04	5,464	1,764	1,984	7,041	2,300	2,497	1,597	536	513	29%	30%	26%
881.05	4,541	1,063	510	4,500	1,060	499	-38	-3	-11	-1%	0%	-2%
881.06	5,318	1,825	1,942	5,341	1,844	1,963	17	19	21	0%	1%	1%
881.07	6,506	1,715	781	6,214	1,634	770	-276	-81	-11	-4%	-5%	-1%
882.01	4,130	1,075	852	5,744	1,514	1,459	1,620	439	607	39%	41%	71%
882.02	3,229	866	399	3,577	967	665	349	101	266	11%	12%	67%
882.03	5,253	1,456	1,439	5,223	1,450	1,411	-19	-6	-28	0%	0%	-2%
883.01	6,753	1,708	1,252	6,700	1,705	1,234	-50	-3	-18	-1%	0%	-1%
883.02	6,241	1,754	1,016	6,186	1,749	988	-60	-5	-28	-1%	0%	-3%
884.01	5,534	1,300	314	5,501	1,300	309	-39	0	-5	-1%	0%	-2%
884.02	5,575	1,260	2,407	10,740	2,464	5,199	5,171	1,204	2,792	93%	96%	116%
884.03	8,445	1,954	1,058	8,369	1,948	1,073	-81	-6	15	-1%	0%	1%
885.01	7,456	1,812	944	7,387	1,806	918	-79	-6	-26	-1%	0%	-3%
885.02	6,381	1,526	2,656	7,587	1,826	3,141	1,215	300	485	19%	20%	18%
886.01	6,819	2,026	1,427	6,491	1,938	1,383	-317	-88	-44	-5%	-4%	-3%
886.02	5,389	1,633	2,205	5,003	1,525	2,168	-394	-108	-37	-7%	-7%	-2%
887.01	7,500	2,019	2,893	7,165	1,940	2,860	-340	-79	-33	-5%	-4%	-1%
887.02	6,876	1,630	1,543	6,334	1,510	1,513	-549	-120	-30	-8%	-7%	-2%
888.01	10,232	2,798	879	9,445	2,597	855	-795	-201	-24	-8%	-7%	-3%
888.02	6,825	1,528	619	6,408	1,443	603	-425	-85	-16	-6%	-6%	-3%
889.01	7,697	1,683	1,688	7,582	1,668	1,617	-92	-15	-71	-1%	-1%	-4%
889.02	5,851	1,192	1,063	5,796	1,188	1,040	-53	-4	-23	-1%	0%	-2%
889.03	9,611	1,923	3,223	9,529	1,918	3,179	-106	-5	-44	-1%	0%	-1%
889.04	6,636	1,447	1,252	6,478	1,421	1,218	-161	-26	-34	-2%	-2%	-3%
889.05	5,717	1,308	1,561	7,352	1,692	2,515	1,631	384	954	29%	29%	61%
890.01	8,172	1,641	380	8,119	1,640	377	-57	-1	-3	-1%	0%	-1%
890.03	4,302	846	3,328	4,261	843	3,258	-48	-3	-70	-1%	0%	-2%
890.04	8,225	1,745	1,412	8,153	1,740	1,412	-77	-5	0	-1%	0%	0%
891.02	7,723	1,592	2,454	7,709	1,588	2,415	14	-4	-39	0%	0%	-2%
891.04	6,709	1,329	1,050	6,654	1,326	1,048	-62	-3	-2	-1%	0%	0%
891.05	7,213	1,123	958	7,283	1,141	958	53	18	0	1%	2%	0%
891.06	4,426	941	1,077	4,324	914	1,036	-84	-27	-41	-2%	-3%	-4%
891.07	6,513	1,290	691	6,454	1,286	682	-66	-4	-9	-1%	0%	-1%
992.02	9,905	2,032	3,938	9,471	1,954	3,936	-438	-78	-2	-4%	-4%	0%
992.03	6,868	1,546	592	6,735	1,525	559	-140	-21	-33	-2%	-1%	-6%
992.04	5,002	1,408	1,251	4,828	1,367	1,502	-176	-41	251	-4%	-3%	20%
992.12	5,755	1,725	1,919	5,881	1,764	1,872	130	39	-47	2%	2%	-2%
992.14	3,895	1,432	1,170	3,834	1,418	1,138	-62	-14	-32	-2%	-1%	-3%
992.15	6,513	1,979	953	6,200	1,895	923	-313	-84	-30	-5%	-4%	-3%
992.16	4,925	1,564	825	4,718	1,507	771	-207	-57	-54	-4%	-4%	-7%
992.17	2,902	985	1,213	2,712	926	1,169	-191	-59	-44	-7%	-6%	-4%

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992.20	6,745	2,638	1,132	7,264	2,858	2,042	518	220	910	8%	8%	80%
992.22	5,252	1,484	1,585	5,214	1,482	1,552	-39	-2	-33	-1%	0%	-2%
992.23	6,001	1,751	1,714	5,800	1,702	2,109	-203	-49	395	-3%	-3%	23%
992.24	4,048	1,133	1,138	3,918	1,103	1,067	-132	-30	-71	-3%	-3%	-6%
992.25	3,820	1,065	1,712	3,768	1,039	1,548	-53	-26	-164	-1%	-2%	-10%
992.26	4,782	1,260	720	4,512	1,196	695	-273	-64	-25	-6%	-5%	-3%
992.27	7,178	2,091	2,061	8,264	2,422	2,339	1,084	331	278	15%	16%	13%
992.29	7,335	2,496	16,928	7,650	2,631	16,989	313	135	62	4%	5%	0%
992.30	5,049	1,602	1,579	4,808	1,534	1,518	-242	-68	-61	-5%	-4%	-4%
992.31	6,556	1,888	1,092	6,211	1,799	1,044	-346	-89	-48	-5%	-5%	-4%
992.32	6,347	2,082	3,055	6,023	1,987	2,943	-324	-95	-112	-5%	-5%	-4%
992.33	3,987	1,126	981	3,806	1,081	932	-182	-45	-49	-5%	-4%	-5%
992.34	3,692	1,283	2,071	3,536	1,236	2,010	-157	-47	-61	-4%	-4%	-3%
992.35	5,630	2,020	1,517	5,503	1,986	1,451	-128	-34	-66	-2%	-2%	-4%
992.37	4,080	1,282	860	3,936	1,244	830	-145	-38	-30	-4%	-3%	-3%
992.38	4,772	1,475	824	4,581	1,424	804	-192	-51	-20	-4%	-3%	-2%
992.39	4,689	1,433	834	4,456	1,370	796	-234	-63	-38	-5%	-4%	-5%
992.40	6,223	2,282	772	5,959	2,198	690	-264	-84	-82	-4%	-4%	-11%
992.41	4,867	1,665	1,888	4,771	1,642	1,832	-97	-23	-56	-2%	-1%	-3%
992.42	4,256	1,139	1,220	4,859	1,308	1,143	602	169	-77	14%	15%	-6%
992.43	4,941	1,844	621	4,837	1,816	606	-102	-28	-15	-2%	-2%	-2%
992.44	4,397	1,921	592	4,303	1,891	582	-95	-30	-10	-2%	-2%	-2%
992.45	3,499	1,111	1,529	3,419	1,092	1,486	-81	-19	-43	-2%	-2%	-3%
992.46	4,286	1,247	1,304	4,237	1,240	1,272	-50	-7	-32	-1%	-1%	-2%
992.47	3,629	790	321	3,598	788	321	-32	-2	0	-1%	0%	0%
992.48	5,926	1,376	370	5,874	1,372	370	-54	-4	0	-1%	0%	0%
992.49	4,771	814	725	4,731	812	725	-41	-2	0	-1%	0%	0%
992.50	3,431	1,120	1,653	3,267	1,070	1,554	-141	-50	-99	-4%	-4%	-6%
992.51	6,241	2,248	5,055	5,975	2,165	4,858	-269	-83	-197	-4%	-4%	-4%
993.05	8,809	3,230	2,395	9,237	3,407	2,268	426	177	-127	5%	5%	-5%
993.06	7,086	2,887	1,016	6,839	2,803	982	-248	-84	-34	-3%	-3%	-3%
993.07	3,995	2,003	2,262	4,952	2,498	5,881	956	495	3,619	24%	25%	160%
993.08	6,356	2,205	752	6,298	2,198	747	-59	-7	-5	-1%	0%	-1%
993.09	4,992	1,986	2,362	4,697	1,879	2,230	-296	-107	-132	-6%	-5%	-6%
993.10	5,291	2,183	401	5,209	2,162	391	-83	-21	-10	-2%	-1%	-2%
993.11	4,694	2,090	2,211	4,518	2,023	2,087	-173	-67	-124	-4%	-3%	-6%
994.02	10,021	2,098	7,523	12,255	2,581	8,525	2,232	483	1,002	22%	23%	13%
994.04	5,378	1,775	664	5,274	1,751	643	-105	-24	-21	-2%	-1%	-3%
994.05	4,831	1,693	1,133	4,749	1,674	1,076	-83	-19	-57	-2%	-1%	-5%
994.06	5,004	1,713	875	4,948	1,704	824	-56	-9	-51	-1%	-1%	-6%
994.07	2,809	966	1,146	2,784	963	1,108	-26	-3	-38	-1%	0%	-3%
994.08	4,503	1,619	1,015	4,446	1,608	984	-57	-11	-31	-1%	-1%	-3%

Highlighted numbers indicate differences greater than +/-100 or +/-10%

Attachment 3:
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
994.10	4,836	1,606	3,981	7,836	2,619	5,693	2,999	1,013	1,712	62%	63%	43%
994.11	6,338	2,078	3,496	7,089	2,338	4,255	750	260	759	12%	13%	22%
994.12	5,313	1,914	895	5,207	1,887	830	-106	-27	-65	-2%	-1%	-7%
994.13	9,842	3,594	5,512	12,288	4,633	7,872	2,460	1,039	2,360	25%	29%	43%
994.15	6,556	2,029	636	6,357	1,979	623	-200	-50	-13	-3%	-2%	-2%
994.16	5,224	2,259	640	5,163	2,246	629	-62	-13	-11	-1%	-1%	-2%
994.17	5,829	2,448	480	5,510	2,328	472	-320	-120	-8	-5%	-5%	-2%
995.02	782	195	213	732	183	213	-47	-12	0	-6%	-6%	0%
995.04	2,997	1,040	4,355	4,115	1,439	4,306	1,118	399	-49	37%	38%	-1%
995.06	1,430	701	916	1,415	698	832	-15	-3	-84	-1%	0%	-9%
995.08	5,340	2,165	1,052	5,208	2,124	1,026	-133	-41	-26	-2%	-2%	-2%
995.09	4,170	2,686	843	4,178	2,677	843	31	-9	0	1%	0%	0%
995.10	4,735	3,288	1,297	4,691	3,277	1,479	-50	-11	182	-1%	0%	14%
995.11	3,850	1,909	885	3,813	1,902	885	-42	-7	0	-1%	0%	0%
995.12	3,158	1,478	1,326	3,116	1,467	1,326	-46	-11	0	-1%	-1%	0%
995.13	2,626	1,244	900	2,598	1,238	801	-28	-6	-99	-1%	0%	-11%
995.14	6,595	2,380	587	6,523	2,368	572	-73	-12	-15	-1%	-1%	-3%
996.01	8,435	2,039	8,116	8,945	2,238	8,466	511	199	350	6%	10%	4%
996.02	3,700	1,065	1,800	3,644	1,053	1,743	-52	-12	-57	-1%	-1%	-3%
996.03	7,195	2,382	31,484	7,015	2,336	32,062	-183	-46	578	-3%	-2%	2%
996.04	4,216	1,212	876	4,163	1,204	835	-52	-8	-41	-1%	-1%	-5%
996.05	4,733	1,589	3,229	4,711	1,591	3,542	-23	2	313	0%	0%	10%
997.01	6,093	1,638	1,313	7,198	1,948	1,387	1,088	310	74	18%	19%	6%
997.02	9,062	2,519	2,322	11,126	3,114	3,983	2,041	595	1,661	23%	24%	72%
997.03	5,216	1,654	4,473	7,947	2,539	6,906	2,730	885	2,433	52%	54%	54%
998.01	6,487	1,553	2,250	6,363	1,521	2,173	-108	-32	-77	-2%	-2%	-3%
998.02	4,902	1,407	2,159	5,222	1,510	2,249	325	103	90	7%	7%	4%
998.03	6,552	1,717	2,203	6,328	1,668	2,140	-226	-49	-63	-3%	-3%	-3%
999.02	5,415	1,361	1,004	5,245	1,326	957	-173	-35	-47	-3%	-3%	-5%
999.03	6,448	1,500	1,150	9,952	2,339	1,844	3,507	839	694	54%	56%	60%
999.04	7,839	2,186	1,618	7,891	2,214	1,529	53	28	-89	1%	1%	-6%
999.05	3,768	1,389	1,648	3,638	1,349	1,612	-132	-40	-36	-4%	-3%	-2%
999.06	5,484	1,693	627	5,416	1,682	593	-72	-11	-34	-1%	-1%	-5%
1100.01	5,177	1,546	735	5,112	1,536	717	-58	-10	-18	-1%	-1%	-2%
1100.03	3,592	1,130	818	3,561	1,127	796	-36	-3	-22	-1%	0%	-3%
1100.04	5,282	1,695	1,343	5,220	1,685	1,314	-69	-10	-29	-1%	-1%	-2%
1100.05	3,628	1,164	551	3,576	1,154	543	-57	-10	-8	-2%	-1%	-1%
1100.06	3,044	1,090	803	5,361	1,931	2,097	2,318	841	1,294	76%	77%	161%
1100.07	4,901	1,679	481	4,840	1,668	478	-66	-11	-3	-1%	-1%	-1%
1100.08	4,436	1,709	1,873	4,394	1,703	1,870	-42	-6	-3	-1%	0%	0%
1100.10	5,198	1,430	481	5,131	1,420	466	-64	-10	-15	-1%	-1%	-3%
1100.11	3,089	1,098	5,490	3,062	1,095	4,996	-25	-3	-494	-1%	0%	-9%

Highlighted numbers indicate differences greater than +/-100 or +/-10%

Attachment 3:
2008 SCAG Draft Forecast Dataset Differences: Plan/Policy Less Baseline Forecast

2000 Census Tract	SCAG Baseline Forecast (OCP-2006) Population	SCAG Baseline Forecast (OCP-2006) Households	SCAG Baseline Forecast (OCP-2006) Employment	SCAG Policy Forecast Population	SCAG Policy Forecast Households	SCAG Policy Forecast Employment	Difference Policy - Baseline Population	Difference Policy - Baseline Households	Difference Policy - Baseline Employment	% Difference Policy - Baseline Population	% Difference Policy - Baseline Households	% Difference Policy - Baseline Employment
1100.12	5,853	1,847	1,006	5,787	1,837	1,006	-74	-10	0	-1%	-1%	0%
1100.14	5,589	1,940	3,784	5,558	1,925	3,799	-23	-15	15	0%	-1%	0%
1100.15	3,983	1,230	3,298	3,918	1,217	3,185	-79	-13	-113	-2%	-1%	-3%
1101.02	6,504	1,931	857	6,325	1,889	807	-181	-42	-50	-3%	-2%	-6%
1101.04	6,930	2,279	4,424	6,563	2,171	3,813	-364	-108	-611	-5%	-5%	-14%
1101.06	4,052	1,234	412	4,015	1,230	361	-35	-4	-51	-1%	0%	-12%
1101.08	3,192	1,030	7,605	3,554	1,150	7,840	370	120	235	12%	12%	3%
1101.09	5,697	1,924	1,714	5,637	1,915	1,455	-57	-9	-259	-1%	0%	-15%
1101.10	7,223	2,196	5,811	6,506	1,981	4,870	-741	-215	-941	-10%	-10%	-16%
1101.11	6,844	2,202	2,088	6,169	1,996	1,790	-672	-206	-298	-10%	-9%	-14%
1101.13	2,766	837	19,319	2,695	821	17,495	-71	-16	-1,824	-3%	-2%	-9%
1101.14	5,479	1,511	1,904	5,425	1,505	1,644	-51	-6	-260	-1%	0%	-14%
1101.15	4,005	1,152	5,205	3,971	1,149	4,938	-35	-3	-267	-1%	0%	-5%
1101.16	5,666	1,517	1,648	5,603	1,507	1,574	-61	-10	-74	-1%	-1%	-4%
1101.17	6,380	2,127	1,749	6,265	2,101	1,458	-112	-26	-291	-2%	-1%	-17%
1101.18	3,134	760	84	3,115	760	83	-17	0	-1	-1%	0%	-1%
1102.01	8,286	2,728	1,425	8,119	2,689	1,368	-174	-39	-57	-2%	-1%	-4%
1102.02	8,749	2,426	1,302	8,693	2,410	1,270	-24	-16	-32	0%	-1%	-2%
1102.03	6,151	1,780	629	6,070	1,767	611	-82	-13	-18	-1%	-1%	-3%
1103.01	7,504	2,204	1,115	7,405	2,188	1,073	-105	-16	-42	-1%	-1%	-4%
1103.02	6,659	1,680	4,048	7,007	1,779	3,972	342	99	-76	5%	6%	-2%
1103.03	5,450	1,527	531	5,411	1,525	508	-41	-2	-23	-1%	0%	-4%
1103.04	5,492	1,395	456	5,438	1,389	439	-46	-6	-17	-1%	0%	-4%
1104.01	5,242	1,408	3,946	7,820	2,115	5,036	2,572	707	1,090	49%	50%	28%
1104.02	6,273	1,460	6,619	6,075	1,413	6,415	-180	-47	-204	-3%	-3%	-3%
1105.00	9,822	2,538	12,602	9,808	2,550	12,667	-4	12	65	0%	0%	1%
1106.03	9,705	2,607	2,926	9,647	2,607	3,289	-64	0	363	-1%	0%	12%
1106.04	8,781	2,630	1,455	9,617	2,899	1,751	828	269	296	9%	10%	20%
1106.05	7,733	2,274	1,723	7,559	2,236	1,711	-189	-38	-12	-2%	-2%	-1%
1106.06	5,606	1,332	1,876	5,447	1,302	1,827	-168	-30	-49	-3%	-2%	-3%
1106.07	4,729	1,463	1,801	7,193	2,240	3,292	2,459	777	1,491	52%	53%	83%
Total	3,653,984	1,118,493	1,981,902	3,699,217	1,133,563	1,991,722	45,229	15,073	9,821	1%	1%	0%

Highlighted numbers indicate differences greater than +/-100 or +/-10%

CITY OF CERRITOS

CIVIC CENTER • 18125 BLOOMFIELD AVENUE
P.O. BOX 3130 • CERRITOS, CALIFORNIA 90703-3130
PHONE: (562) 860-0311 • FAX: (562) 916-1242

February 19, 2008

VIA E-MAIL
Jessica Meaney
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017
meaney@scag.ca.gov

Subjects: **COMMENTS REGARDING SCAG DRAFT 2008 RTP – CITY OF CERRITOS**

Dear Ms. Meaney:

Thank you for the opportunity to comment on the Southern California Association of Governments' Draft 2008 Regional Transportation Plan (RTP). On Thursday, February 14, 2008, the City of Cerritos was provided with maps depicting the Draft Baseline Growth Forecasts and the Draft Policy Growth Forecasts for the Gateway Cities Council of Governments (GCCOG) sub-region. The attached table accompanying this letter outlines specific comments and corrections to the Draft Policy Growth Forecasts map.

Given the sub-regional scale of the map, it is difficult to read exactly which parcels are proposed for specific land uses in the Draft Policy Growth Forecasts scenario. We have made the best attempt to guess which specific areas are targeted and have provided comments accordingly on the attached table.

Should you have any questions regarding these comments, please do not hesitate to call me at (562) 916-1201 or email me at Robert_A_Lopez@ci.cerritos.ca.us. Thank you for your consideration of our comments.

Sincerely,

Robert A. Lopez
Advance Planning/Redevelopment Manager

ral
cc *(via e-mail)*
Art Gallucci, City Manager
Torrey N. Contreras, Director of Community Development
Hal Arbogast, Director of Public Works
Richard Powers, Executive Director, Gateway Cities Council of Governments
Nancy Pfeffer, Director of Regional Planning, Gateway Cities Council of Governments

Attachment: List of Comments

LIST OF COMMENTS – CITY OF CERRITOS
SCAG DRAFT 2008 RTP: DRAFT POLICY GROWTH FORECASTS
FEBRUARY 19, 2008

Comment Number	Assumed Location*	Comment
01	Southeast corner of Bloomfield Avenue and Artesia Boulevard	This area contains commercial retail uses and is not suitable for "City Neighborhood" uses as proposed on the draft map.
02	Northeast corner of Studebaker Road and Del Amo Boulevard	This property is a Southern California Edison (SCE) substation containing overhead power lines and is thus not suitable for "Industrial" uses or any other development containing permanent structures.
03	Southern side of South Street between Studebaker Road and the City of Artesia boundary	This area contains new commercial retail uses and is not suitable for "Office Park" uses as proposed on the draft map.

* All locations are in the City of Cerritos. Due to the sub-regional scale of the map, we are unable to note the TAZ number of the subject properties.

DENNIS R. YATES
Mayor

EUNICE M. ULLOA
Mayor Pro Tem

CITY of CHINO

GLENN DUNCAN
EARL C. ELROD
TOM HAUGHEY
Council Members

PATRICK J. GLOVER
City Manager

February 19, 2008

Ms. Jessica Kirchner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

RE: 2008 RTP Draft PEIR

Dear Ms. Kirchner:

Thank you for providing the City of Chino an opportunity to review and comment on the Draft Program Environmental Impact Report (PEIR) for the 2008 Regional Transportation Plan (RTP).

Based upon staff's review of the project, the City of Chino has the following comments:

In 2005, the City of Chino opened the Chino Transit Center, which today functions as a hub for Omnitrans and Foothill Transit, and in the future will provide connections to Metrolink stations throughout the region. Please ensure that the Chino Transit Center is properly recognized in the RTP and the traffic impacts are considered in the supporting environmental documents.

Since the development of the 2004 RTP, Chino has planned for tremendous growth in two specific plan areas of the City. The Preserve and College Park Specific Plans will add approximately 12,000 new units to the City over the next couple decades. Several amendments have been made to these specific plans since their adoption, so it is critical that SCAG has the most up to date information when considering regional growth. Additionally, the City is in the middle of a comprehensive update to its General Plan, which will also add growth and impact transportation in the region.

Please analyze the projected impacts resulting from increased goods movement along the 60 Freeway, State Route 71, and State Route 83 (Euclid Avenue).

13220 Central Avenue, Chino, California 91710
Mailing Address: P.O. Box 667, Chino, California 91708-0667
(909) 627-7577 • (909) 591-6829 Fax
Web Site: www.cityofchino.org

Impacts on the City's local roadway infrastructure will occur on Central Avenue, Ramona Avenue, Mountain Avenue, Chino Avenue, Edison Avenue, Chino Hills Parkway, and Pine Avenue, on both on and off-ramps leading to and from the affected arterials.

Thank you again for providing the City of Chino the opportunity to review the subject documents. Should you have any questions, please feel free to contact me at (909) 464-8310.

Sincerely,

Michael T. Kellison, AICP
Senior Planner

cc: Charles E. Coe, AICP, Director of Community Development
Jose Alire, Director of Public Works
Karen Nieckula, Associate Engineer
Community Development Department File

City of
Chino Hills

February 11, 2008

Jessica Kirchner
Senior Regional Planner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Subject: Comments on Program Environmental Impact Report (PEIR) for 2008 Regional Transportation Plan

Dear Ms. Kirchner:

Thank you for the opportunity to comment on the PEIR for the 2008 Regional Transportation Plan. The Plan addresses the transportation needs for the Southern California Association of Governments (SCAG) through 2035, including both specific projects and strategies that address transportation and urban form. The purpose of the 2008 PEIR is to identify the potentially significant environmental effects of implementing the projects, programs, and policies included in the RTP.

Since the individual projects are under consideration for the RTP, the City of Chino Hills requests that SCAG include within the PEIR and the RTP transportation projects that would enhance mobility, air quality, and quality of life for residents who live in the "Four Corners" area, where San Bernardino, Riverside, Los Angeles, and Orange Counties meet. This area continues to experience significant traffic congestion as a result of the expansive population growth in the Inland Empire (San Bernardino and Riverside Counties). Infrastructure improvements continue to be inadequate to meet the travel demand.

The area-wide concern related to transportation issues in this area has led to the formation of two entities that view transportation issues on a regional basis:

- The Four Corners Transportation Coalition, which is a coalition of 9 Cities, Riverside County, and Caltrans, and focuses on regional transportation issues; and

- The Pine/Schleisman Working Group, which was spearheaded by County Supervisors in both San Bernardino and Riverside Counties, as well as affected communities along the corridor between SR-71 in Chino Hills and I-215 in the City of Riverside.

Improvements related to one or both of these regional groups that we wish to have included in the PEIR and the RTP are as follows:

February11, 2008

1. Pine/Schleisman Corridor: The RTP includes some segments of this project such as the Pine Avenue Extension between SR-71 and SR-83, but does not recognize the corridor in its entirety. Recognizing the entire transportation corridor between SR-71 and I-215 demonstrates the importance of the entire corridor to easing traffic congestion and, in turn, enhancing air quality in the area.

2. Widening of SR-71 from the San Bernardino/Riverside County Line to SR-91: Although the ultimate widening of this section of SR-71 is identified in Caltrans' system master plan, there is no program date for this improvement. This project is essential to maximizing the benefit of the Pine/Schleisman Corridor. Failure to address this segment in conjunction with specifically identified projects has potentially negative environmental impacts including increased traffic congestion; degradation of air quality; and increased noise impacts to adjacent residential areas.

3. Widening and off-ramp improvements to SR-71 from SR-57 to SR-60 (in the City of Pomona and Los Angeles County): This project would enhance mobility for both commercial traffic and residents of the Inland Empire to and from the Los Angeles area.

Since the above listed projects are not fully identified in the PEIR, the City of Chino Hills is requesting that SCAG include these projects in the PEIR and the RTP. Additionally, the PEIR needs to analyze the project impacts relative to transportation, air quality, land use, etc.

We appreciate the opportunity to comment on the PEIR. Once the final PEIR and RTP are available for public review, please send us a copy of the documents. If you have any questions regarding this letter, please contact Christine Kelly, Community Development Director at (909) 364-2742.

Sincerely,

Douglas N. La Belle
City Manager

DLB:AD:ssr

cc: Mayor and City Council
Kathy Gotch, Assistant City Manager
Raymond T. Holland, Interim City Engineer
Christine Kelly, Community Development Director
John Mura, Assistant to the City Manager
Jim DeStefano, City of Diamond Bar, City Manager
Pat Glover, City of Chino, City Manager
Linda Lowry, City of Pomona, Assistant City Manager
Tim O'Donnell, City of Brea, City Manager

Citizens United to Save South Pasadena
414 Fairview Avenue
South Pasadena, CA 91030
Phone: 626 799-2876 Email: NO710@sbcglobal.net

Citizens United to Save South Pasadena is a grass-roots organization formed to protect the integrity of South Pasadena and preserve the quality of life here. We oppose the extension of the Long Beach 710 Freeway and actively support solutions to local and regional transportation problems with non-freeway alternatives.

February 18, 2008

Southern California Association of Governments
818 West 7th Street, 12 Floor
Los Angeles, California 90017-3435

Re: Response to 2008 Regional Transportation Plan (RTP)

Dear Southern California Association of Governments,

The Southern California Association of Governments (SCAG) needs to accept some responsibility for population growth. Government agencies are famous for claiming they are only responding to existing conditions. This denial of responsibility implies that nothing can be changed. The truth is that for the survival of our country and the planet, everything must change.

As recently as three (3) years ago SCAG held a workshop where each of the San Gabriel Valley cities was pressured to create higher density housing to accept population growth. Now claiming the growth that their policies encouraged to be an "existing condition" SCAG is responding with 56-year old freeway dinosaurs.

In today's world, priority must be given to mass transit projects. Caltrans has admitted that they cannot build their way out of congestion. The answer to gridlock pollution is for SCAG to give highest priority to innovative mass transit projects such as the Flyaway Buses, which coordinate several transit systems. The Gold Line completion to the Ontario Airport and the Purple Line "subway to the sea" projects should be given priority funding status. Grade separation projects should also be given priority funding status, both for efficiency and safety.

Innovative solutions such as the non-polluting Texas Transportation Institute's SAFE Freight Shuttle* from shipside to distribution centers are particularly needed for goods

movement. Restructuring of the cost schedule for the Alameda Corridor to promote maximum utilization is key to efficient goods movement while reducing freeway truck traffic. Then emphasis must be placed on grade separation of the Alameda Corridor East.

While unwilling to commit to a mass transit solution, SCAG has become so enthusiastic about a freeway approach that they have thrown both caution and ethics to the wind. Representations were made at public meetings promising a study of extending the SR-710 via tunnels, never the less the final product could at best be described as a mere concept paper. Consequently, "preliminary engineering and technical studies" have been authorized to answer the questions not adequately addressed in the first study. The MTA (METRO) assured the public that none of these studies would be used as an Environmental Impact Report (EIR) and that a full EIR process would be required.

To try to subvert either process or law by declaring a "demonstration project" only adds to the public's growing perception of government corruptness. Any proposal that moves the SR-710 Gap Closure project from the Strategic Projects into the Constrained Projects portion of the RTP based on projected future changes in law breaks the public's trust in any promises made by government at any level. Once the public's trust is broken, future funding for any project is in jeopardy.

We urge you to reconsider your actions.

On behalf of the Board of Citizens United to Save South Pasadena,

Diana Stoney
Secretary

*www.freightshuttle.com

cc Congress Member, Adam Schiff
Assembly Member, Anthony Portantino
City of South Pasadena City Manager, Lilian Myers
City of South Pasadena Mayor Michael Cacciotti
City of South Pasadena Council Members; Phillip Putnum, Mike Ten, Dr. Richard Schneider, David Sifuentes
State of California, Department of Transportation – District 7, Otis Jackson, Chief, Governmental and Legislative Affairs Unit
METRO, Ms. Pam O'Connor, LACMTA Chair

The City Project

1055 Wilshire Blvd., Suite 1660 Los Angeles, CA 90017-2499 T: (213)977-1035 F: (213)977-5457 www.cityprojectca.org

February 19, 2008 FINAL

Gary C. Ovitt, President
Hasan Ikhrata Executive Director
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

Re: Public Comments on SCAG RTP, Open Space, and Environmental Justice

Dear Mr. Ovitt and Mr. Ikhrata:

I. Overview

The City Project submits these public comments regarding the SCAG draft 2008 Regional Tranportation Plan (RTP) (December 6, 2007); the draft 2008 RTP Environmental Justice Report (December 2007); and the Open Space Chapter 3.10 of the draft 2008 RTP Program Environmental Impact Report (PEIR). The City Project has previously raised many of these concerns through the SCAG open space work group.

We respectfully submit that the cited SCAG reports are not adequate to address the impact of the regional transportation plan on environmental justice communities including low income people, people of color, and Native Americans, on open space needs, and on the need for transit to trails. The reports need to be significantly revised, as discussed in the conclusion.

II. Discussion

There are unfair inequities in the distribution of environmental benefits, including green space, and environmental burdens, including air and ground pollution, between more and less affluent communities in California.

Four of the six SCAG counties are among the eight counties in the state with the greatest need for green space – in combined terms of the fewest acres of green space per thousand residents, and highest levels of child obesity, youth, poverty, and people of color. These facts are illustrated and analyzed in the accompanying Policy Report by Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at pages 3-6, Map 1, and Tables 9A-9F.

County averages can mask dramatic disparities in access to green space within the county. As reported in the Los Angeles Times, for example, there are large disparities in the amount of park acreage for L.A. residents. *See generally* Robert García and Aubrey White, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region* at pages 3-5, 7-10, and Maps 101-102, 401, 402, 403, and Charts 401C and 1203C (2006); *see also* Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access*

and Equity for California at 5.

In addition, California has the nation's highest concentration of people of color living near hazardous waste facilities. Statewide, 81% are people of color. Greater Los Angeles is the worst in the nation, with 1.2 million people living less than two miles from 17 hazardous waste facilities. 91%, or 1.1 million, are people of color. Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 6-7.

Southern California should develop and implement a strategic plan for a "Transit to Trails" program to take people to parks, beaches, forests, lakes, and other public natural spaces. A Transit to Trails program would serve all the people of the region, but would be particularly useful to the working poor with limited or no access to cars, who are disproportionately people of color and low income. Transit to Trails would reduce traffic congestion and parking problems, improve air quality, and reduce run-off of polluted water into rivers and the ocean. It would also reduce dependency on the automobile and fossil fuels. Today, there is virtually no good way to reach the four Southern California forests using public transportation. Transit to beaches is limited, time-consuming, and expensive. Low cost transit service should link great urban parks with outlying green space. SCAG has the opportunity to include Transit to Trails in its next Regional Transportation Plan. The Olmsted Report envisioned a transportation system for people to reach natural public places. Robert García and Aubrey White, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region* at 14.

The values at stake in providing equitable transportation and land use planning for the region include promoting the simple joys of playing in the park; human health; youth development and academic performance; conservation values of clean air, water, and land, habitat protection, and climate justice; economic vitality for all; spiritual values in protecting people and the earth; cultural and historical values at parks such as San Onofre State Beach; and sustainable regional planning. Fundamental principles of equal justice and democracy underlie each of these other values. *See* Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 7-9.

Providing equitable transportation and land use planning for the region is good policy – and good law. Federal and state laws prohibit both intentional discrimination and unjustified discriminatory impacts for which there are less discriminatory alternatives in the provision of public resources. An important purpose of the statutory civil rights framework is to ensure that recipients of public funds do not maintain policies or practices that result in discrimination based on race or ethnicity. The SCAG RTP process can proactively achieve compliance with civil rights, environmental, and other laws. Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* at 9-10.

Title VI of the Civil Rights of 1964 and its implementing regulations guard against both (1) intentional discrimination based on race, color or national origin, and (2) unjustified discriminatory impacts for which there are less discriminatory alternatives, by applicants for or recipients of federal funds. *Id.*

California laws also guard against intentional discrimination and unjustified discriminatory impacts by recipients of state funds under Government Code section 11135. In addition,

California law defines environmental justice as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." *Id.*

The California Coastal Commission adopted a local coastal plan requiring Malibu to maximize public access to the beach while ensuring the fair treatment of people of all races, cultures, and incomes in 2002. Commissioner Pedro Nava told the Los Angeles Times he hoped to set a precedent for other communities. *Id.*

California law also promotes respectful government to government consultation with California Indian tribes regarding land use planning that may impact traditional cultural properties. SB 18 and the tribal consultation guidelines published by the Office of Planning and Research require agencies to consult with Indian Tribes.

SCAG should be increasingly responsive to, and held accountable for, the impact of its plans on environmental justice communities, especially now that people of color are in the majority in California. *Id.*

III. Conclusion

The SCAG RTP, EIR, and Open Space plans and Envioronmental Justice Report should present a region-wide vision and strategic plan for the investment of transportation resources to alleviate real and perceived inequities in access to green space and transportation. The principles below in many respects present the necessary framework.

Principle 1. Transportation resource decisions have widespread impacts on health, housing, development, investment patterns, climate justice, and quality of life. The process by which those decisions are reached, and the outcomes of those decisions, must be fair and beneficial to all.
Principle 2. Transportation investments should be guided by a regional vision that includes a comprehensive web of communities, parks, schools, beaches, forests, rivers, mountains, and transit to trails to achieve results that are equitable; promote human health, the environment, and economic vitality; and serve diverse community needs.
Principle 3. Infrastructure areas should be planned together in complementary rather than conflicting ways to serve health, education, human service, and environmental needs; to fulfill critical governmental and societal responsibilities; and to produce equitable results. For example, transit can provide access to trails.
Principle 4. Transportation priorities should be thoroughly assessed through an equity lens. For example, there are unfair disparities in transportation access, green space, and child obesity.
Principle 5. Employment, economic, and environmental benefits associated with building and maintaining transportation infrastructure should be distributed fairly among all communities. Local jobs with livable wages should go first to local residents. Job training should be provided for those who need it to qualify for jobs. There should be a level playing field for small, women, and minority business enterprises.
Principle 6. Revenues to support transportation improvements should be collected and allocated to distribute fairly the benefits and burdens of the projects. Resources should be targeted to the

most underserved communities to overcome unfair disparities.
Principle 7. Transportation infrastructure decision-making should be transparent and include mechanisms for everyone to contribute to the planning and policymaking process.
Principle 8. Standards for measuring equity and progress should be articulated and implemented to guide planning and investments, and to hold agencies accountable.
Principle 9. In making transportation investments and decisions, recipients of federal and state funds including SCAG should proactively comply with federal and state laws designed to achieve equal access to public resources, including Title VI of the Civil Rights Act of 1964 and its implementing regulations, California Government Code 11135, and the California statutory definition of environmental justice. Compliance with civil rights, environmental, and other laws should be combined.
Principle 10. Government agencies including SCAG should dedicate resources to enable community based organizations to serve their communities and actively participate in infrastructure planning and investments.

We look forward to working with you to accomplish these goals.

Sincerely,

Robert García	Angela Mooney-D'Arcy
Executive Director and Counsel	Policy Director

Enclosures:

Robert García and Aubrey White, *Healthy Parks, Schools and Counties: Mapping Green Access and Equity for California* (2007)

Robert García and Aubrey White, *Healthy Parks, Schools and Communities: Mapping Green Access and Equity for the Los Angeles Region* (2006)

2008 Regional Transportation Plan
Comments from CVAG

To: Southern California Association of Governments (SCAG)
From: Coachella Valley Association of Governments (CVAG)
Date: February 19, 2008
Subject: Comments to the SCAG 2008 RTP

As a SCAG subregion, CVAG has carefully reviewed the draft 2008 RTP released by SCAG for public comments. CVAG staff has attended the SCAG sponsored RTP workshops and participated in the many RTP presentations and reviews over the past few months. CVAG realizes the importance of this document, to provide a framework for the future development of our regional transportation system.

The collective projects identified in the RTP document are a collaborative and comprehensive plan, addressing the transportation needs of the region for the next 20 years. After careful review of all segments of the draft RTP Plan, CVAG has some serious comments to discuss, and requests for inclusion in the Plan.

The CVAG subregion is a fast growing area of Southern California, with major development of affordable residential housing, expanding employment centers, and continually expanding tourist destination resorts. CVAG would like to see more emphasis on the importance of the CVAG jurisdictions as an expanding population center for the region, included in the Plan.

With the many approved CVAG and Coachella Valley RTIP, RTP and Arterial Projects submitted by the Riverside County Transportation Commission (RCTC) for the growing CVAG areas, we have identified an RTIP project that has been left out. In the city of Indian Wells, west city limits to Cook Street, widen from four to six lanes, by 2012, with a cost of $1,082,000. Please add this project to the corrected RTP Plan.

CVAG, working with SCAG Compass staff, held many workshops and presentations for the planning staffs, electeds, and city managers from CVAG jurisdictions. Careful consideration was given to reviewing growth data and developing a technically accurate and acceptable baseline forecast for the CVAG subregion. CVAG is very concerned with SCAG discussions of intent to adjust and manipulate the approved baseline forecast, to a "policy" forecast. With the "policy" forecast, thousands of Riverside County's expected population growth would be shown as population numbers, residing in the coastal communities of Southern California. As we are all aware, affordable residential housing is readily available in the CVAG subregion, and in other areas of Riverside County, but the housing costs in the coastal communities is prohibitive, and affordable for only the very wealthy. The "policy" forecast plan concerns CVAG greatly, along with the consequences of transportation funds inappropriately transferred to coastal areas, taking away from Riverside County, where the actual growth is taking place.

Correct and accurate airport information needs to be added to the RTP. Specifiacally, the CVAG subregion has the Palm Springs International Airport, located in the city of Palm Springs, along with the General Aviation Airports located in the eastern areas of Riverside County, east of the Coachella Valley. Airports are located in Thermal, Blythe, Chiraco Summit, and Desert Center.

To the Riverside County Strategic Plan Projects, CVAG is requesting the addition of two projects that we have been assured by SCAG, would be included in the 2008 RTP. The Palm Springs International Airport must be added to the High Speed Rail connections of the other Southern California major airports. With a population that will reach one million in the next twenty years, and as a major tourist destination, the Palm Springs International Airport must be included in the High Speed Rail plans.

CVAG is requesting plans for Truck Climbing Lanes, on I-10, near the Chiraco Summit and Blythe areas, be included in the 2008 RTP. We are all aware of the volume of trucks involved with goods movement in these areas, and the serious accidents caused by trucks slowing automobile traffic in this segment of I-10, east of the Coachella Valley, in eastern Riverside County.

Please add these additions and corrections to the 2008 RTP, to help make this a complete and accurate document.

CITY OF COSTA MESA

P.O. BOX 1200 • 77 FAIR DRIVE • CALIFORNIA 92628-1200

DEVELOPMENT SERVICES DEPARTMENT

February 14, 2008

Mr. Frank Wen
Planning and Policy Department
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

SUBJECT: FEEDBACK ON POLICY GROWTH FORECAST MAPS, ASSUMPTIONS AND METHODOLOGY

Dear Mr. Wen:

The City of Costa Mesa has reviewed the Growth Forecast Maps provided by SCAG and the Center for Demographic Research and has concerns with regard to the distribution of households. The following are the City's comments on the Policy Growth Forecast Maps (Please see attached for specific recommended numeric adjustments).

HOUSEHOLDS

Census Tracts 633.01, 638.03, 638.08, 639.02, and 639.05: These tracts are predominantly established single-family residential neighborhoods, as well as commercial properties along Harbor Boulevard. Therefore, a decrease in tracts 638.03 and 638.08, and significant increase of households in tracts 633.01 639.02 and 639.05 is unlikely.

Census Tracts 636.01, 636.04, 637.01, and 639.08 **:** In 2004, the City adopted Urban Plans that encourage residential, live/work, and mixed-use developments mainly in the southwestern portion of the City. With the potential of households in these Urban Plan areas and projects currently submitted to the City, a slight increase in projected households would be accurate.

Census Tract 637.02**:** This tract consists of commercial properties and residential neighborhoods that are built-out and anticipate minimal growth. Currently, there is a planning application at the City for a mid-rise located at Triangle Square for only 120 residential units. Therefore, the additional 588 households shown on the forecast map is unlikely.

Census Tract 638.07**:** This tract is primarily zoned Institutional & Recreational and contains a golf course and the Fairview Developmental Center. The State is considering residential development on the Shannon's Mountain area on a 10-acre

surplus parcel. With a required General Plan Amendment and Rezone, approximately 300-units are being considered for the site. Therefore, an increase of 436 households is unlikely.

Census Tract 639.07: The majority of this tract is within the North Costa Mesa Specific Plan. Development Agreements within this specific plan area have an option to allow for high-rise residential projects. In addition, Irvine Apartment Communities has a project currently under construction for an 890-unit apartment complex. Therefore, the forecast numbers should include a higher distribution of households in the 639.07 census tract.

The City of Costa Mesa is very interested in the Policy Growth Forecast and RTP and we look forward to future dialogue. We hope to share information on the projected distribution of growth, so that we can all gain a better understanding of possible future connections between land use and transportation. If you have any questions or need additional information, please contact me at (714) 754-5604.

Sincerely,

Kimberly Brandt

KIMBERLY BRANDT, AICP
Assistant Dev. Svs. Director

cc: Donald D. Lamm, Deputy City Mgr., Dev. Svs. Director
Claire Flynn, AICP, Principal Planner
Gail Shiomoto-Lohr, Contract Planner, City of Mission Viejo/OCCOG TAC

Policy Growth Forecast Maps

Recommended Adjustments for the City of Costa Mesa

2000 Census Tract	Provided Housing Forecast	Proposed Housing Forecast
633.01	54	18
636.01	-36	10
636.04	-4	185
636.05	71	42
637.01	-6	40
637.02	588	275
638.03	-57	-16
638.07	436	337
638.08	-43	-3
639.08	-51	46
639.02	221	26
639.05	131	24
639.07	697	1017
Totals in tracts recommended for adjustment	**2001**	**2001**

CITY OF CULVER CITY

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ALAN CORLIN
MAYOR

CAROL A. GROSS
VICE MAYOR

COUNCIL MEMBERS
D. SCOTT MALSIN
STEVEN J. ROSE
GARY SILBIGER

February 18, 2008

Ms. Jessica Meaney
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Subject: Comments on the Draft 2008 SCAG Regional Transportation Plan

Dear Ms. Meaney:

Culver City is pleased to note that all of the City's priority projects including the completion of the Exposition Light Rail project, the initial stages of the Subway to the Sea, and preliminary planning for the I-10 Robertson/National ramp realignment are being considered as part of the baseline Regional Transportation Plan (RTP) projects. These projects are important solutions for relieving some of the traffic congestion on the Westside of Los Angeles County. The City is also pleased to note that all of the City's RTIP projects have been included in the baseline RTP projects as well.

We would like to note a few minor corrections that we would like to be seen made to the report.

- The Exposition Light Rail project from downtown Los Angeles to Santa Monica is discussed in the RTP. The Phase II alignment in the regional map of Rail Transit Projects (Exhibit 3.6) draws the light rail line through Venice Blvd. and Sepulveda Blvd. While Culver City supports Phase I and II of the Exposition Light Rail project, we are opposed to this map's alignment and have been in discussion to ensure that the alignment of Phase II of the project is along the current railroad right of way. Building a light rail line along the currently mapped route would significantly negatively impact traffic along the currently congested Venice Blvd. and Sepulveda Blvd.

- On Page 105 where there is a summary of the Exposition Corridor Light Rail Line Phase I and II, the point to point destination for Phase I and II should read respectively: (Downtown LA to Culver City - Washington/National) and (Culver City - Washington/National to Santa Monica)

- Metro Rapid Bus expansion (to 28 lines) are discussed with the map indicating Bus Rapid Transit (BRT) lines along Sepulveda Blvd., Lincoln Blvd., Wilshire Blvd., and Santa Monica Blvd. on Page 105 of the RTP. However, Culver CityBus, along with Santa

Monica Big Blue Bus, and Torrance Transit, will be operating 4 of the 28 Bus Rapid Transit lines. SCAG should correct statement, because Metro does not plan to operate all of the BRTs in LA County.

One suggestion that Culver City has for a future RTP study would be to perform a major surface arterial Peak Speed analysis, similar to the Freeway Peak Speeds analysis (with maps and discussion). Major surface arterials such as Washington Boulevard, Venice Boulevard, Sepulveda Boulevard, Wilshire Boulevard, Santa Monica Boulevard, San Fernando and San Gabriel Valley major arterials, etc., are subject to slow speeds and congestion as would be experienced on freeways during the same peak hours. A plausible reason for this congestion is that drivers decide to exit freeways in search of more efficient routes. As more drivers engage in this tactic major arterials become clogged and drivers then search out "short cuts" through residential streets impacting those neighborhoods. For Los Angeles County, this is a crucial traffic congestion issue that should be reviewed.

In regards to SCAG's RTP proposal to decentralize the airport passengers and cargo from LAX by creating better airport ground access, we would also like to comment that moving passengers and cargo from LAX to other airports will also create more traffic congestion through the City of Culver City unless the High Speed Rail Projects are in place and are reasonably priced. Otherwise, we would prefer that passengers and cargo traveling through the SCAG region would remain at LAX for their connecting flights so as to not create additional traffic congestion through our city.

Thank you for providing the opportunity to comment on the Draft 2008 RTP. Should you have any further questions regarding these comments, feel free to contact Grace Eng Nadel with the Culver City's Transportation Department at (310) 236-6543.

Sincerely,

Alan Corlin
Mayor

Cc: Honorable Members of the City Council
Jerry Fulwood, City Manager
Martin R. Cole, Assistant City Manager
Marlee Chang, Assistant City Manager
Steve Cunningham, Transportation Director
Grace Eng Nadel, Senior Management Analyst

CITY of CYPRESS

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Phone 714-229-6700 www.ci.cypress.ca.us

February 14, 2008

Dr. Frank Wen
Planning and Policy Department
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

Subject: Comments Regarding the SCAG Policy Growth Forecasts

Dear Dr. Wen:

The City of Cypress has previously participated in various workshops to review and comment on the Southern California Association of Governments (SCAG) Policy Growth Forecasts and associated maps for inclusion in the 2008 Regional Transportation Plan (RTP) and the 2008 Compass Blueprint Plan for the SCAG Region. The City understands that these growth forecasts have important funding significance, because state agencies considering the allocation of funds for projects will look for consistency with regional Blueprint Planning policies for the promotion of "smart growth" principles. Thus, contrasts between SCAG's proposed Policy Growth Forecast/Compass Blueprint Plan and the City's adopted plans for growth could jeopardize future funding opportunities.

The 2006 Orange County Projections (OCP) dataset is the result of exhaustive efforts by local jurisdictions to provide an accurate forecast of population, housing, and employment based on local familiarity with opportunities and constraints. Therefore, the City of Cypress does not support the use of any forecast that does not incorporate the 2006 OCP.

At the December 11, 2007, meeting of the Orange County Council of Governments' (OCCOG) Technical Advisory Committee (TAC), you gave a presentation that overviewed the RTP growth forecasts process. You also confirmed that SCAG's Regional Growth Forecasting staff has tried to ensure consistency between the 2006 OCP and the SCAG "Baseline" growth forecast, since the OCP reflects local and sub-regional input on how the region will grow. Based on this assumption, the City of Cypress would not contest SCAG's Baseline growth forecasts.

During the same presentation, you explained that the "Policy" growth forecast does not include any Compass Blueprint strategies before the year 2015. The City of Cypress would support this part of the Policy growth forecasts. Following your presentation, the OCCOG TAC members reviewed the provided maps of Orange County which illustrate the Compass Blueprint Plan and the associated Policy growth forecast culminating in the year 2035. The City of Cypress staff has further reviewed these maps in comparison to the 2006 OCP, the 2001 Cypress General Plan, and adopted City development agreements. In general, most of the discrepancies in the Cypress census tracts represent insignificant decreases compared to the 2006 OCP for 2035 household and employment. However, some of SCAG's 2035 Policy growth forecast numbers represent major deviations from the City's expected future development.

Todd W. Seymore, Mayor

Leroy Mills, Mayor Pro Tem **Doug Bailey**, Council Member

Phil Luebben, Council Member **Prakash Narain, M.D.**, Council Member

As recommended by SCAG staff, we are providing the following table detailing the affected census tracts and the reasons for our recommendations to have SCAG adjust the 2035 Policy growth forecast numbers for the City of Cypress to be more consistent with the 2006 OCP for 2035.

SCAG 2035 POLICY GROWTH FORECASTS FOR THE CITY OF CYPRESS		
HOUSEHOLD GROWTH		
Census Tract	**Difference from OCP**	**Revision Requested**
1101.04	-108 (5%)	This area includes mixed-use (Lincoln Avenue Specific Plan) and multiple-family residential zoning on currently underutilized parcels that could accommodate this number of new households through redevelopment activities.
1101.10	-215 (10%)	Same as above.
1101.11	-206 (-10%)	Same as above.
EMPLOYMENT GROWTH		
Census Tract	**Difference from OCP**	**Revision Requested**
1100.11	-494 (9%)	This area includes existing business park development that could accommodate this number of new jobs through business growth.
1100.15	-113 (4%)	Same reason as CT 1100.11 above.
1101.04	-611 (14%)	This area includes existing commercial development along Walker, Ball, & Moody Streets, as well as mixed-use (Lincoln Avenue Specific Plan) zoning on currently underutilized parcels that could accommodate this number of new jobs though commercial growth and redevelopment activities.
1101.06	-51 (13%)	This area includes existing commercial development, as well as existing planned residential development with home-based businesses, both types of which could accommodate this number of new jobs through business growth.
1101.09	-259 (16%)	This area includes existing commercial and school developments that could accommodate this number of new jobs through school expansion and business growth.
1101.10	-941 (17%)	This area includes mixed-use (Lincoln Avenue Specific Plan) zoning on currently underutilized parcels that could accommodate this number of new jobs though redevelopment activities. The existing Cypress College campus could also accommodate additional jobs through its planned expansion.

EMPLOYMENT	GROWTH	(continued)
Census Tract	**Difference from OCP**	**Revision Requested**
1101.11	-298 (15%)	This area includes mixed-use (Lincoln Avenue Specific Plan) zoning on currently underutilized parcels that could accommodate this number of new jobs though commercial redevelopment activities.
1101.13	-1,824 (10%)	This area includes existing business park development, as well as planned commercial development (Cypress Business & Professional Center Specific Plan) that could accommodate this number of new jobs.
1101.14	-260 (14%)	This area includes existing commercial and business park development that could accommodate this number of new jobs through business growth.
1101.17	-291 (17%)	This area includes existing commercial development, as well as existing planned residential development with home-based businesses, both types of which could accommodate this number of new jobs.

We would appreciate an opportunity to discuss with SCAG staff the City's recommended forecast changes noted above, in hopes that these changes could be incorporated into SCAG's Policy growth forecast and the RTP prior to its final adoption. Please contact me at (714) 229-6724 or knevarez@ci.cypress.ca.us.

Sincerely,

Kori Nevarez

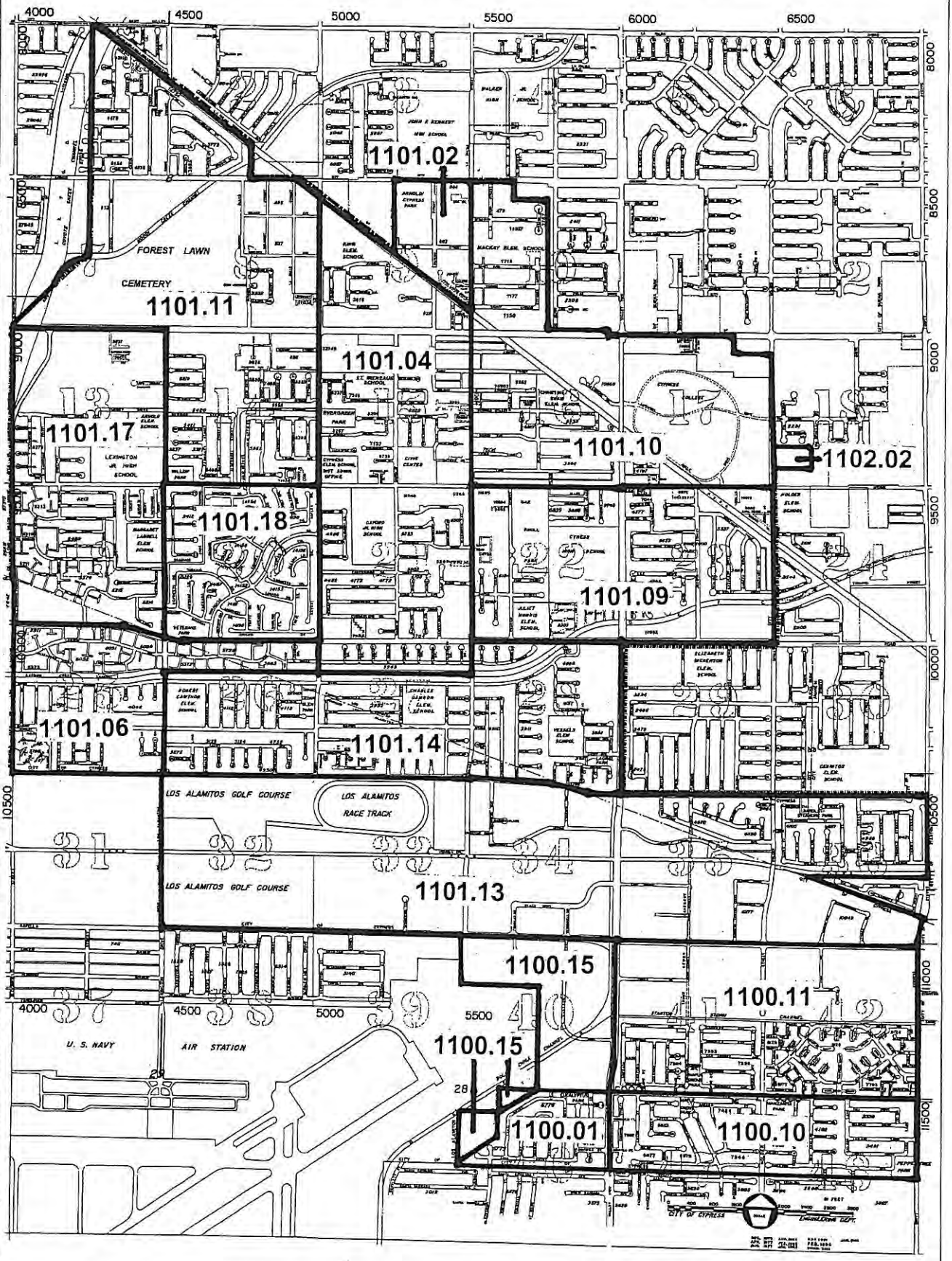
Kori Nevarez
Associate Planner
Community Development Department

KN/nv
Attachment: Cypress Census Tracts Map

cc: John Bahorski, City Manager
Ted Commerdinger, Director of Community Development
Leroy Mills, Mayor Pro Tem
Christine Barnes, OCCOG Board Representative for SCAG District 18
Tracy Sato, Senior Planner, City of Anaheim/ OCCOG TAC
Gail Shiomoto-Lohr, Contract Planner, City of Mission Viejo, OCCOG TAC
Deborah Diep, CSUF Center for Demographic Research

CITY OF CYPRESS
COUNTY OF ORANGE, CALIFORNIA

CENSUS TRACTS
YEAR 2000



CITY OF CYPRESS DEPARTMENT OF PUBLIC WORKS ENGINEERING DIVISION	CITY OF CYPRESS STREET MAP	
	PUBLIC WORKS PROJECT NO.	SCALE: APPROX. 1"=1600'

CITY of CYPRESS

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Phone 714-229-6700 www.ci.cypress.ca.us

February 15, 2008

Ms. Jessica Meaney
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

Subject: Comments Regarding the Draft 2008 Regional Transportation Plan (RTP) and Program Environmental Impact Report (PEIR)

Dear Ms. Meaney:

The City of Cypress staff has reviewed the subject RTP and PEIR documents that were prepared by the Southern California Association of Governments (SCAG) and released for public review on January 4, 2008. The City offers the following comments and recommended changes to these documents:

1. It is our understanding that SCAG Policy Growth Forecast for the 2008 RTP would incorporate the 2008 Compass Blueprint Program. As previously described by SCAG, the Compass Blueprint Program focuses growth on key opportunity areas that would target the growth within two percent of the SCAG Region. Specifically, the Compass Blueprint Program redistributes projected jobs and housing into major transit centers and employment centers, as well as shifting planned growth out of areas with long commute times. When the City of Cypress participated in the review of the Compass Blueprint Program and the associated land use maps, we were told that the Program would be voluntary. We are concerned that the incorporation of the Program's growth projections into a regulatory document like the RTP would change its nature from voluntary to required - especially in light of the RTP consistency finding that is required to qualify for transportation funding.

2. As previously mentioned in our feedbag to SCAG at the Compass Blueprint Program map workshops, Cypress recommends the use of the 2006 Orange County Projections (OCP) as the most accurate growth forecast. The OCP incorporates extensive research and comments from the Orange County jurisdictions with regard to the land use designations and planned growth areas set forth in the adopted General Plans and Development Agreements, including the 2001 Cypress General Plan. Therefore, the City of Cypress recommends that the growth projections from the 2006 OCP be used for the purposes of transportation and air quality conformity in the RTP instead of SCAG's Compass Blueprint Program projections.

3. If SCAG does not use the 2006 OCP for the RTP growth projections, then the City recommends that the Compass Blueprint Program projections for the City of Cypress be revised to reflect the detailed revisions requested in the City's letter to Frank Wen at SCAG (dated February 14, 2008, under separate cover). The

Todd W. Seymore, Mayor

Leroy Mills, Mayor Pro Tem **Doug Bailey**, Council Member

Phil Luebben, Council Member **Prakash Narain, M.D.**, Council Member

requested changes would correct inconsistencies between the SCAG growth forecast assumptions and the City's adopted zoning and land use patterns.

4. It appears that many of the mitigation measures from SCAG Draft Regional Comprehensive Plan (RCP) that address growth impacts (not just transportation and road project impacts) have been incorporated into the draft RTP Program EIR. Since the Draft RCP has not gone through a complete public review, these measures may not be appropriate in the RTP EIR. Additionally, the City's General Plan EIR already addresses growth inducing impacts with mitigation measures for projects constructed within our jurisdiction. Therefore, we recommend the removal of mitigation measures in the draft RTP Program EIR that are not related to transportation project implementation, as well as the removal or revision of mitigation measures with questionable growth related requirements (i.e. provisions for open space, green building, and solid waste facilities).

5. If some of the growth related mitigation measures for the RTP are necessary to address State requirements regarding greenhouse gases, we recommend that the measures contain the term "should" (recommended) rather than "shall" (required).

6. Many of the RTP EIR mitigation measures (i.e. solid waste) list requirements that would not apply to projects conducted by regional transportation agencies, such as the Orange County Transportation Authority (OCTA). For example, OCTA has no influence regarding the siting of new landfills, the building of local markets for waste reduction, or the development of waste reduction facilities (MM-PS.8 through 14). In these cases we recommend that SCAG staff consider whether the listed impact is appropriate or correctly worded for transportation projects. Accordingly, such measures should be deleted or revised to designate an appropriate responsible agency for the measures.

Sincerely,

Kori Nevarez

Kori Nevarez
Associate Planner
Community Development Department

KN/nv

cc: John Bahorski, City Manager
Ted Commerdinger, Director of Community Development
Leroy Mills, Mayor Pro Tem
Christine Barnes, OCCOG Board Representative for SCAG District 18
Tracy Sato, Senior Planner, City of Anaheim/ OCCOG TAC
Gail Shiomoto-Lohr, Contract Planner, City of Mission Viejo, OCCOG TAC
Deborah Diep, CSUF Center for Demographic Research

City of Diamond Bar

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February 19, 2008

Jessica Kirchner
Senior Regional Planner
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Dear Ms. Kirchner:

We recognize the importance of the Southern California Association of Governments' ("SCAG") draft 2008 Regional Transportation Plan ("2008 RTP") and Draft Program Environmental Impact Report ("PEIR"). It is also our understanding that integration of the RTP with other plans is critical; such as the Regional Transportation Improvement Program ("RTIP") down to individual projects. We also would like to acknowledge the efforts of the San Gabriel Valley Council of Governments ("SGVCOG") and believe you will receive comments from the SGVCOG on the 2008 RTP and PEIR.

Our intent of this letter make clear the City of Diamond Bar's concerns (that very well could become regional concerns), while reserving the right to submit further detailed comments if we can not achieve satisfactory resolution of these primary issues. The RTP and PEIR must support timely resolution of mixed flow traffic congestion on the SR-60 and specifically at the confluence of the SR-60 and SR-57. Immediate solutions to mixed flow traffic congestion is of primary importance to the City of Diamond Bar and must be adequately recognized and included in the 2008 RTP, PEIR, and any other associated plans and documents.

We ask that you proceed with finalization of the RTP and PEIR, only after modification of pertinent text and assumptions, to address our stated concerns, have been included in these documents.

REQUESTS AND COMMENTS

The following requests and comments are provided to clarify our concerns, so they may be addressed as the final documents are prepared.

Jack Tanaka
Mayor

Ron Everett
Mayor Pro Tem

Wen P. Chang
Council Member

Carol Herrera
Council Member

Steve Tye
Council Member

Recycled paper

- ***Mitigation of Existing and Future Mixed Flow Traffic Congestion at the SR-57/60 Interchange Needs to be Included.***

  Mitigation of existing and future mixed flow traffic congestion at the SR-57/60 interchange is of critical importance to the City of Diamond Bar. The City has been actively participating in various improvement efforts that affect this area; including but not limited to the Los Angeles County Metropolitan Transportation Authority ("Metro") feasibility study of potential large scale improvements for the SR-57/60, modification of the Grand Avenue interchange at SR-57/60 being proposed by the City of Industry, development of the planned Lemon Avenue interchange at SR-60, and participation in the completion of the high occupancy vehicle ("HOV") facilities for SR-60 that serve a portion of the SR-57/60 interchange.

  In particular we did not find reference to potential, future SR-57/60 large scale improvements that are expected to result from the current Metro studies. We did note that approximately $1.2 billion is included for SR-57/SR-60 Interchange Improvements by year 2023, but this does not concur with current understandings provided by Metro. While we welcome inclusion of this dollar value, we want to insure that the funding can be used for the Metro study's large scale improvements and not necessarily dedicated truck lanes.

  It is the City of Diamond Bar's expectation that mixed flow traffic improvements will be implemented for this freeway confluence area (which is also critical to the region as a whole). These improvements may include added benefits such as (but would not be limited to) construction of missing freeway connectors, development of added high occupancy vehicle ("HOV") facilities, provision of goods movement improvements, etc. We request that the SCAG RTP and other associated plans recognize Metro's current work and the future SR-57/60 mixed flow improvements that are expected to result from this and subsequent analyses, so these mixed flow improvements may be programmed for implementation without delays.

- ***Opposition to Proposals that Serve to Concentrate Goods Movement along the SR-60 Freeway (e.g. between the I-710 and I-15 Freeways).***

  The City of Diamond Bar fully supports projects that will provide improved goods movements throughout the SCAG region. The potential goods movement improvements, however; must result in a balanced approach using many routes and must not place undue emphasis on one path. For example, the draft RTP in the Goods Movement Report (page 23) when addressing "Dedicated Lanes for Clean Technology Trucks", identifies the "specific corridors under consideration for such enhancements are I-710, SR-60, and I-15 corridors". The SCAG RTP and associated documents need to be

modified to allow full consideration of all potential routes and alternatives for accommodating truck lanes and/or goods movement. We believe this is also a primary request of the SGVCOG as well.

At the SCAG public hearing meetings, the City of Diamond Bar's expressed concerns included potential for truck lanes on SR-60. SCAG response at the meetings indicated that the truck lanes will be available for use by only clean, new technology vehicles. Does the RTP specifically allow use of future truck lanes, from day one and there after, by only new technology, zero emission, "clean" trucks? This is this impression we were left with, based on the response at the public meeting.

Other technical documents have also identified the SR-60 as the preferred route for truck lanes and did not appear to limit use to new "clean" trucks. The City of Diamond Bar has already expressed significant concerns with the Metro "Multi-County Goods Movement Action Plan" (see attached letter, dated January 15, 2008) as there are believed to be many unsubstantiated conclusions contained in that report. Overall the City of Diamond Bar support use of the SR-60 to provide its "fair share" of the goods movement burdens, but is strongly opposed to its designation and implementation as a "Primary" goods movement corridor. We are very concerned that RTP "mandated" truck lanes along the SR-60 would actually preclude (e.g., due to right-of-way, constraints, environmental impacts, costs, etc.) some mixed flow improvement options. If there were unlimited funding available and no environmental factors existed, then perhaps potential truck lanes would not impact potential mixed flow solutions; but obviously that is not a reality.

Based on the RTP it appears that rail and alternative technologies may also result in viable methods to serve increased goods movement needs (i.e.; rather than construction of dedicated truck lanes, etc.). We believe the RTP needs to highlight the pursuit of these goods movement alternatives, given existing constraints on the highway system and in particular on the SR-60.

- ***Concern that Inclusion and/or Absence of SR-57/60 Improvement Projects Will Mandate and/or Preclude Consideration and Ultimate Implementation.***

We understand that the SCAG RTP and other related documents are the result of significant efforts and are under time constraints in moving toward approvals of final reports. In general, the City of Diamond Bar is very concerned that the current drafts appears to contain text and materials that may serve to "mandate", implementation of truck lanes and/or focus goods movements along "primary" corridors (specifically the SR-60 Freeway), while also excluding the potential for mixed flow improvement projects. We respectfully request modification of the documents to best address our

concerns. Given the voluminous amounts of materials we believe that SCAG and the authors of the reports can best implement edits that will address our concerns, while maintaining the integrity of the overall documents.

In short we need the RTP to consider the potential for only mixed flow improvements to be implemented on SR-60 and the potential for exclusion of truck lanes on the SR-60. While we understand this cannot be the only consideration, it must be one of the potential scenarios highlighted in the RTP.

We mention other related documents, as we understand there will be on-going coordination between SCAG and Metro to assure consistency between their two plans. There is also the "Multi-County Goods Movement Action Plan", as well as other studies that will need to be considered and made consistent with the SCAG RTP and Metro's Long Range Transportation Plan.

The City of Diamond Bar has already committed significant efforts to assure that our voice is heard. We have attended public hearings for the RTP, the PEIR for the RTP, and a policy committee meeting in efforts to express concerns that are not new, but certainly still of critical importance to our community. Our elected officials and community have provided a clear message that solutions to mixed flow traffic congestion is the number one priority. It is our current understanding that implementation of exclusive truck lanes on the SR-60 as identified in the RTP and other technical documents, would likely result in significant impacts to mixed flow traffic congestion. The following comments summarize the issues raised by the City of Diamond Bar at the SCAG public hearings and serve to emphasize our concerns and issues:

Traffic Congestion

- The City of Diamond Bar is committed to finding real solutions to the SR-57/60 traffic congestion, which will benefit local and regional citizens. As it stands, the draft RTP does not appear to be consistent with this goal.
- Residents of Diamond Bar and the region as a whole have been living with traffic congestion at the SR-57/60 interchange far too long. In addition, the City of Diamond Bar endures substantial impacts from commuters avoiding freeway congestion with the use of our City's streets.
- The environmental studies for the implementation of four truck lanes (two in each direction) on the I-710 Freeway from the Ports to the SR-60 have begun. Given the proposed termination of the project at the SR-60, we must conclude that SR-60 will be heavily impacted.

Environmental Impact

- The City of Diamond Bar believes any plans that will direct truck traffic to SR-60 will only increase health and safety issues.

- The SR-57/60 interchange is already heavily impacted so adding significant truck traffic to this area is expected to have air quality, noise, and safety impacts, as well as added traffic impacts.

Alternative Routes, Modes and Technologies

- The RTP suggests that there are alternative routes, modes and technologies that will be looked at, but the technical reports seem to encourage truck lanes on the SR-60.
- For instance, on page 23 of the Goods Movement Report which contains the heading "Dedicated Lanes for Clean Technology Trucks", the RTP states, "specific corridors under consideration for such enhancements are I-710, SR-60, and I-15 corridors."
- Another example is contained in the Metro Multi-County Goods Movement Action Plan, which identified the SR-60 as the "preferred" truck route option. However, this assumption was found to be an unproven conclusion without proper technical support. The City of Diamond Bar has submitted comments expressing our concerns with this report.

Funding

- According to the Metro 2008 Draft Long Range Transportation Plan, approximately $475 million has been programmed by Metro for improvements at the SR-57/60 interchange. However, this contrasts the $1.2 billion identified for the SR-57/60 Interchange Improvements in the financially constrained RTP projects list. If added monies are intended to be available it would be the ideal scenario, if however, a different project is envisioned in the RTP (like truck lanes) then we have major concerns.
- We need clarification of the SR-57/60 improvements envisioned and included in the RTP. We are very concerned that provision of truck lanes on the SR-60 will serve to exclude improvements that would serve the general motoring public.

Equitable Solutions

- The City of Diamond Bar has always understood and supported the development of goods movement across Southern California and the Country as a whole. However, we have two primary concerns regarding the emphasis on SR-60:
    1. We have not seen any credible analysis to show that SR-60 is the "best" route based upon utility and community compatibility.
    2. Even if SR-60 is the "best" route, it should not be the only route.
- There must be a genuine effort to consider all possible routes to serve the ever-increasing demands of the east-west goods movement between the I-710 and I-15. It is unreasonable to designate the SR-60 as the singular east-west route.

- Ending the I-710 truck lanes at SR-60 appears to rule out the I-10, I-91, and I-210 as possible routes to share the truck burden.
- The City of Diamond Bar has been participating in the Metro's SR-57/60 Improvement Feasibility Study. This study considers improvements for all traffic types rather than just truck lanes. Our City is concerned that the RTP may not respect potential solutions that are expected to come out of this study.

In Conclusion

- We need to make certain that the SR-57/60 improvements included in the final RTP, place the mobility of people as the highest priority.
- We respectfully request an update of the RTP and PEIR to assure that all possible improvement options that may emerge from the SR-57/60 Improvement Feasibility Study area can be considered so that the best improvement options may be implemented without undue delays.
- Attempts to focus truck travel on the SR-60 are not new. This type of proposal has been previously pursued. The City of Diamond Bar and for that matter other cities and communities along the SR-60, are sure to be concerned about being put in another adversarial position. Based on past actions our constituents have been strongly opposed to proposals that require the SR-60 "shoulder the burden" of east-west truck movements and have been willing to "go the distance" in their efforts against such proposals.

SUMMARY

All analyses and materials reviewed to date cast doubt upon the conclusion that truck lanes along SR-60 Freeway are a "preferred" option. We respectfully request update of the RTP and PEIR to assure that all possible improvement options (including mixed flow traffic improvements, construction of missing connectors, added HOV facilities, incorporation of goods movement improvements, etc.) at the SR-57/60 interchange area can be considered, so the best improvement option(s) may be implemented without undue delays.

Thank you in advance for your attention to our concerns. Should you have any questions regarding this letter, please contact Mr. David G. Liu, Director of Public Works/City Engineer at (909)839-7040.

Sincerely,

James DeStefano
City Manager

c: City Council
David G. Liu, Director of Public Works/City Engineer
Nick Conway, SGVCOG

City of Diamond Bar

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January 15, 2008

Shahrzad Amiri
Metro
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: Technical Memorandum 6b – Evaluation of Detailed Goods Movement Strategies, Multi-County Goods Movement Action Plan.

Dear Ms. Amiri:

The City of Diamond Bar is supportive of the Metropolitan Transportation Authority's efforts to develop a regional goods movement plan. We recognize the importance of freight movement as a key economic driver and its influence on quality-of-life in the region.

After reviewing the subject Technical Memorandum 6b, we have significant concerns with the conclusions and underlying analysis presented in the most recent working papers generate for the Multi-County Goods Movement Action Plan. We ask that you not proceed with developing any further recommendations or take any formal actions until our concerns have been addressed.

Unsubstantiated Conclusions

Working Paper 6b (Evaluation of Detailed Goods Movement Strategies) – draws the following conclusion on Page 3-21: "Therefore, a truck lane system from the San Pedro Bay Ports to Victorville on I-710, SR-60, and I-15 would be the preferred option." On this same page, the statement is made that "SR-60 clearly offers the best performance..." Both of these statements are based upon sketch-level analysis in five subject areas that we discuss below. We do not believe the analysis is sufficiently rigorous or meaningful to support such conclusions.

Jack Tanaka
Mayor

Ron Everett
Mayor Pro Tem

Wen P. Chang
Council Member

Carol Herrera
Council Member

Steve Tye
Council Member

Recycled paper

Incomplete or Misleading Analysis

The following interim conclusions are developed in Working Paper 6b regarding the preferred east/west corridor and summarized on Page 3-21.

- ***R-60 would carry the highest level of truck volumes.*** Page 2-17 identifies the average daily truck volumes on the three east/west corridor options as:

  - 10,542 for SR- 91
  - 11,195 for I-10
  - 11,872 for SR-60

  These differences are not meaningful within the "noise" of the forecasting model. Further, the measurement of volumes along each of these routes represents one arbitrary point. If the measurements were taken at different locations then the conclusion may be different.

  In addition, there are important differences in the trucking activities that serve the local region and those that connect the Ports with other parts of the Country. These differences merit substantial considerations and evaluations prior to determining the preferred route. We don't believe this analysis is significantly rigorous to conclude one corridor is better than another.

- ***SR-60 would carry very high vehicle volumes (compared to other options).*** We do not understand why this is relevant to the choice of a preferred corridor. In fact, one can argue that higher auto volumes in a corridor make it less attractive due to potential conflicts with trucks.

  The reduction in corridor delay with the installation of truck lanes is a meaningful factor, but that analysis was not factored into the recommendation as we discuss below.

- ***SR-60 would affect the least number of schools.*** The analysis is based on very general criteria of the number of schools within 1/3 mile. This does not consider how many children are affected, the age of students (elementary or college), whether the impact is to play areas or classrooms, etc.

- ***SR-60 would affect the least amount of residential land uses.*** The analysis is based upon residential acreage, rather than the number of units (or preferably, the number of people). Given the acreage comparison is relatively close between corridors; the actual number of residents within ½ mile may not be the lowest along SR-60.

- ***SR-60 would provide the most connectivity to warehouse/distribution land uses.*** It is not clear whether this analysis represents actual built facilities and/or land use designations. If the later, the analysis may be counting properties that are not economically-viable for warehousing/distribution uses.

  Additionally, existing buildings and/or designated lands may be changed to other uses due to advances in delivery technologies, the need for larger facilities, desires for locations that serve to avoid traffic congestion, etc.

  We also question the relevance of these criteria if the primary purpose of the truck lanes would be to facilitate longer-distance movement of goods, and not local needs.

Missing Analysis

The document provides very little discussion and no details on alternatives to truck lanes. Only one of the 12 scenarios reflects something other than truck lanes, and no quantitative analysis is provided for the "alternative technologies."

The evaluation of costs related to an alternative technology system (e.g., page 3-12) did not appear to consider the savings due to the reduction in trucking costs.

Alternative technologies may have significantly lower construction-related impacts relative to truck lanes. Namely, there will likely be significant congestion impacts associated with added lanes for the routes being considered. This should be considered in the comparison.

Given that travel distance is a primary consideration for minimizing trucking costs, it seems that an east/west route should be evaluated that includes the I-710, I-105, I-605, and the I-10 or I-210.

The cost analysis uses unit costs per mile; consequently, the cost estimate is strictly a function of the corridor length. In reality, the true costs will depend greatly on physical conditions and available right-of-way. We do not believe a unit cost approach provides any meaningful information about the relative costs between corridors.

Given the heightened awareness of the impact of greenhouse gases, we believe a more thorough air quality analysis should be prepared. This might provide a stronger argument for alternative technologies that reduce or shorten truck trips.

Figures 16, 18 and 20 provide meaningful comparisons between alternatives regarding the reduction in auto and truck delays. These comparisons show that truck lanes on I-10 would provide far greater congestion relief than comparable facilities on SR-60. This information is dismissed and not used in the conclusions.

Summary

All of the concerns and questions raised above cast doubt upon the conclusion that truck lanes along State Route 60 are the "preferred" option. Specifically, we believe the current analysis is incomplete and superficial. We also do not agree that the five factors that formed the basis for selecting the "preferred option" are the most pertinent considerations. Based upon these short comings, we do not believe there is sufficient technical support for any recommendation at this time.

Thank you for your attention to our concerns, and we look forward to assisting Metro in developing/implementing a sensible freight movement plan for the region. Should you have any questions, please contact Mr. David G. Liu, Director of Public Works/City Engineer at (909) 839-7040.

Sincerely,

James DeStefano, City Manager

cc: City Council
David Liu, Director of Public Works
Michelle Smith, Metro
Nick Conway, SGVCOG

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February 15, 2008

Via FedEx and email to kirchner@scag.ca.gov

Jessica Kirchner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Re: 2008 Regional Transportation Plan and Draft Program Environmental Impact Report for the 2008 RTP (SCH#2007061126)

Dear Ms. Kirchner:

We submit this letter on behalf of the City of El Segundo to comment on the Southern California Association of Governments' ("SCAG") 2008 Regional Transportation Plan ("RTP" or "Plan") and the Draft Program Environmental Impact Report ("DEIR") for the 2008 RTP. El Segundo recognizes the critical role that Southern California airports play in the region's economy and thus has been on the forefront of promoting a regional air transport system. The City's primary interest in SCAG's 2008 RTP, therefore, relates to the Plan's ability to meet the region's aviation demand and specifically its strategy to decentralize aviation activity.

To this end, we commend SCAG for promoting in the 2008 RTP an aviation decentralization strategy ("decentralization strategy") and for institutionalizing an upper limit of 79 million annual passengers ("MAP") at Los Angeles International Airport ("LAX") through 2035. Quite simply, without a regional air transport system, the SCAG region will be unable to accommodate its long-term aviation demand. The enormous aviation demands on LAX, together with its physical constraints and mandates imposed by the 2006 Stipulated Settlement agreement between Los Angeles World Airports ("LAWA"), El Segundo and other LAX neighbors, dictate that underutilized regional airports must absorb a greater share of regional aviation demand.

Despite the RTP's strategic vision of decentralized aviation, El Segundo is quite concerned that the RTP, and as a result the RTP DEIR, lack sufficient information regarding

airport ground access improvements that are desperately needed to ensure regionalization of aviation activity. As set forth below, and in the attached report prepared by John Eells, transportation and governmental affairs consultant, neither the RTP or its associated technical reports provide sufficient details relating to the nature, purpose and need, anticipated completion dates, and the effectiveness of airport-related ground access projects. *See* John Eells Report, February 11, 2008, attached as Exhibit A. Consequently, the RTP DEIR also fails to adequately describe the aviation strategy component of the RTP and therefore lacks the ability to analyze its environmental impacts or identify appropriate alternatives. It is our opinion that the DEIR for the proposed RTP must be revised to comply with the requirements of the California Environmental Quality Act ("CEQA") (Pub. Res. Code §§ 21000 et seq.) and the CEQA Guidelines (14 Cal. Code Regs. §§ 15000 et seq.) ("CEQA Guidelines").

1. INTRODUCTION

Air traffic in the SCAG region is expected to double during the RTP's planning horizon, from 88 MAP in 2005 to 164 in 2035. 2008 RTP EIR at 3.14-15. The ability of the region to meet this enormous increase in demand poses tremendous challenges. As SCAG's reports clearly acknowledge, the core of the aviation challenge is the limited expansion capacity of LAX due to legally binding agreements as well as limited available land for ground-area expansion. 2008 RTP High-Speed Regional Transport Report, December 2007 at 1. Indeed, the Stipulated Settlement, which represents the culmination of a broad regional effort to satisfy growing air transportation demand at other airports in the Southern California region, includes physical constraints designed to limit LAX to 78.9 MAP through December 31, 2020.

Despite the daunting challenge of decentralizing forecast levels of aviation demand at regional airports, the proposed 2008 RTP and its DEIR contain minimal detail, especially in comparison to prior regional transportation planning efforts. Specifically, SCAG's last iteration of the RTP process - the 2004 RTP - included considerably more information regarding the specific improvements that would be required to achieve an efficient airport ground access system to facilitate decentralized aviation. *See* 2004 RTP Update - Airport Ground Access Report Technical Appendix. We can find no evidence that SCAG has moved forward beyond the planning completed for the 2004 RTP. The need for progress is urgent inasmuch as currently constrained airports, including LAX, are rapidly reaching and exceeding their capacities. The region risks both a substantial loss in economic resources as well as substantial access problems for passengers and cargo if ground access solutions are not expeditiously implemented.

As the transportation planning and programming agency for the Southern California region, SCAG develops strategic plans, and obtains and allocates resources for the region's transportation network. Any transportation improvement project receiving federal or state transportation funds must be included in the proposed 2008 RTP. The RTP is thus a

critically important tool that will profoundly affect the transportation network - and therefore airport ground access - for the next 50 to 100 years. At the same time, the Southern California Regional Airport Authority ("SCRAA") appears to be disbanding. In light of SCRAA's diminishing presence, the need for leadership on the region's aviation strategy has never been more important. Without the commitment and leadership of SCAG, the region's critical and ambitious aviation decentralization strategy cannot succeed.

2. BACKGROUND

A. Urban Airports Are Highly Constrained and Will Be Unable to Meet Regional Air Traffic Demand.

The Southern California airport system will need to be upgraded to handle the substantial increase in air traffic projected by 2035. At the same time, several of the region's airports are highly constrained and therefore unable to handle the forecasted additional air traffic. Currently 90 percent of the region's total aviation demand resides in the urban areas of Los Angeles and Orange counties. 2008 RTP Aviation and Airport Ground Access Report at 3. Although this number is projected to decline slightly by 2035, 82 percent of the future aviation demand will still remain in Los Angeles and Orange counties. *Id.*

LAX is the third busiest airport in the country and fifth busiest in the world in terms of passengers served (2008 RTP Aviation and Airport Ground Access Report at 1) but future growth is constrained to a maximum of 78.9 MAP under the Stipulated Settlement and LAWA's own plans for the airport. In addition, LAX is severely constrained by its limited acreage, its extreme proximity to surrounding communities and by the capacity deficiencies and periods of severe congestion on the freeways and arterials providing access to the airport. The 2004 RTP reports that: "[f]uture ground access conditions at LAX will be characterized by severe freeway congestion spilling over to off-peak periods, as well as growth in background traffic on major through arterials." 2004 RTP- Airport Ground Access Report at18. The 2004 Plan goes on to state that "[a]t 78 MAP, LAX ground access will continue to affect the overwhelming majority of air passengers in the region and should be the focus of immediate short-, and long-term mitigation planning actions." *Id.* at 16. Moreover, the demand currently on LAX stems from the fact that areas with the strongest demand have no other viable airport options and will continue to use LAX for all of their air travel needs including short-haul and long-haul flights unless other viable options are made available. 2004 RTP, Aviation Technical Appendix at D-6-74.

In addition to these constraints, the pressure on LAX to accommodate aviation demand will continue to result in an escalated public safety risk. As LAX reaches the limits of its physical capacity, the likelihood of runway incursions and other safety problems will continue to increase. While the primary cause of runway incursions is human error, there can be no doubt

that the volume of air operations - and the corresponding congestion and delay - aggravate this potentially catastrophic risk.

LAX is not the only constrained airport in the region. Long Beach and John Wayne have strict limits on allowable flights that are legally enforceable (one is a city ordinance and the other is a court settlement agreements) since they predate the Federal Airport Noise and Capacity Act of 1990. 2008 RTP at 69. While Bob Hope Airport forecasts an increase in air passenger allocations, it too has legal and physical capacity constraints. 2008 RTP at Table 3.6 and 2008 RTP - Aviation and Airport Ground Access Report at 13.

The SCAG region, and LAX in particular, is also serving a substantial number of travelers from outside the region, thereby contributing to the capacity constraints. San Diego International Airport is rapidly approaching its physical capacity constraint of 23 MAP and, thus far, the San Diego County Regional Airport Authority has not identified another airport in the San Diego region. 2008 RTP - Aviation and Airport Ground Access Report at 1. Fifteen to 20 percent of San Diego's air passengers and two-thirds of its air cargo is currently served by SCAG region airports because of inadequate airport capacity in San Diego. Specifically, more than 40 commuter flights a day originate in San Diego County and land at LAX, because of inadequate long-haul and international service in San Diego. *Id.* This places additional burdens on the capacity of LAX. The SCAG region is being unfairly burdened with this air traffic. As SCAG notes, "If San Diego does not solve its looming airport capacity problem, it will make the problem in the SCAG region much worse." *Id.*

B. Future Air Carrier Demand Can Be Met by Utilizing Available Capacity at Other Underutilized Regional Airports.

The region has available capacity to serve future demand at new and emerging suburban airports. Ontario International Airport and Palmdale Airport are well positioned to serve a significant share of 2035 air traffic. Ontario International, located in the Inland Empire, is currently at 7.2 MAP and is expected to be able to accommodate approximately 30 MAP. 2008 RTP Aviation and Airport Ground Access Report at 1. Ontario could play an important role in SCAG's aviation decentralization strategy by becoming the region's second major international airport. Ontario is expected to receive large volumes of regional air passenger demand that cannot be served by LAX (constrained to 78 MAP). *Id.* and 2004 RTP Update Airport Ground Access Report at 23. Ontario is further expected to attract most of its passengers from the communities directly surrounding the airport, in San Bernardino County. These passengers will use the airport for short-haul, medium-haul, long-haul and some international service as opposed to traveling to LAX. Ontario will also attract a substantial amount of demand from Orange County, as John Wayne will reach its capacity constraints long before 2030. 2004 RTP, Aviation Technical Appendix at D-6-74, 75. The airport could also attract a significant number of passengers from the San Gabriel Valley and western Riverside County, as well as

communities in central Los Angeles County, if these locations are served by High Speed Regional Transport.

According to the 2008 RTP, Palmdale International Airport ("PMD") is forecast to reach 6.3 MAP in 2035. 2008 RTP, Table 3.6 at 109. High-speed regional transport to PMD is critical as State Route ("SR") 14 is forecast to suffer from recurrent congestion. *See* 2004 RTP Update- Airport Ground Access Report at 32. The 2004 RTP states that decentralized air service in the region assumes that SR-14 will provide reliable and uninterrupted access to Palmdale. Also, because ample real estate in the high desert provides ideal conditions for cargo warehousing and storage, PMD is well positioned to serve a significant share of the regional air cargo market. *Id.*

Finally, it must be acknowledged that it is simply unacceptable that there are no viable airport alternatives south of Newport Beach. Sound aviation and surface transportation planning principles dictate that Orange and San Diego counties vigorously seek solutions to their aviation demands. Additional aviation capacity in the southern counties would certainly facilitate SCAG's attempts to promote regional aviation.

3. THE PROPOSED 2008 RTP IS VAGUE AND LACKS DETAIL REGARDING THE GROUND ACCESS PROJECTS NEEDED TO PROMOTE SCAG'S DECENTRALIZED AVIATION STRATEGY.

A. The 2008 RTP is Entirely Conceptual and Lacks Specific Details Relating to Airport Ground Access Projects.

As the RTP clearly acknowledges, in order to accommodate the increase in aviation demand, the region will need to get future air passengers from the urban areas of Los Angeles and Orange counties to available airport capacity in the Inland Empire (i.e., Ontario) and North Los Angeles County (i.e., Palmdale). 2008 RTP at 69. The challenge of meeting future aviation demand, let alone achieving a decentralized aviation strategy, is complicated by the fact that the regional roadway system is expected to become increasingly unreliable, with daily delay on the system expected to more than double. 2008 RTP Aviation and Airport Ground Access Report at 3. Unless ground access to the region's airports is substantially improved, many potential air travelers will choose not to fly at all, which will translate to substantial economic loss to the region. 2008 RTP at 70. SCAG's 2004 RTP estimated that a constrained 2030 regional airport system even with conservative assumptions about future airport ground access improvements translates to a loss of $18 billion and 131,000 jobs to the economy of Southern California. *Id.* at 3 (citing the 2004 RTP). Based on these planning studies and statistics, two facts become extraordinarily clear: (1) the region will not be able to accommodate the region's projected air demand unless aviation activity is decentralized and, (2) airport ground access is the single greatest obstacle to achieving a decentralized airport system.

The 2008 RTP, like its predecessor the 2004 RTP, suggests the need for substantial airport ground access improvements throughout the region, in both the short and long term. 2008 RTP at 110. To this end, the 2008 RTP states that its airport ground access strategy will help establish a pattern of decentralization, by attracting a critical mass of passengers and airline service at emerging airports. 2008 RTP at 18. The RTP goes on to state that short-term projects such as arterial, intersection and interchange improvements, and increasing transit access to airports would relieve immediate bottlenecks around airports. 2008 RTP Aviation and Airport Ground Access Report at 3. The RTP further explains that, over the long term, the region will need a system of high speed rail to the suburban airports (typically referred to as High Speed Regional Transport). *Id.* at 4.

Given the extraordinary importance that airport ground access will play in meeting the region's aviation demand, one would expect the 2008 RTP to have described its airport ground access strategy in detail. Unfortunately, the RTP is vague, conceptual and lacks detailed information. Thus, for example, while the RTP states that many of the short term ground access improvements were programmed in the 2004 RTP and are being updated for the 2008 RTP (*Id.* at 3), we can find no list of projects nor any indication that the 2008 RTP has been updated to include projects from the 2004 RTP.

The 2004 RTP contained a sophisticated analytical study which assessed the vast spectrum of physical airport and behavioral air passenger attributes that affect ground access in an interactive multi-airport system. See 2004 RTP Update - Airport Ground Access Report at 6. The Airport Ground Access Study prepared for the 2004 RTP took passenger and air cargo forecasts, converted the data into vehicle trips for each airport, added the data to a background traffic forecast using the SCAG regional transportation model, and identified transportation choke points. *Id.* at 6-13. Ground transportation projects were then identified to provide efficient access to the region's 10 air carrier commercial airports. *Id.* Projects were divided into Phase 1 projects (funded, and included in the 2004 RTP), and Phase 2 projects (unfunded, to be considered for future RTPs). *Id.* at 14. A total of $4.01 billion (in year 2002 dollars) for Phase 1 and Phase 2 projects was identified. *Id.* at 45. Despite the extensive planning and seemingly comprehensive list of needed projects, it became apparent that relatively little funding was available for airport ground access projects. Indeed, only about 30 percent of the short term projects were proposed to be funded in the 2004 RTP, representing just over $1 billion. *Id.*

Four years later, we expected the 2008 RTP to pick up where the 2004 RTP left off - both in terms of planning and financing of ground access projects. Unfortunately, it does not. Although the 2008 RTP purports that the region has successfully secured the necessary resources to support transportation investments proposed in past RTP's (RTP at 139), we can find no evidence of this. The 2008 RTP does not discuss, for example, whether those "funded" short term projects identified in the 2004 RTP have now been built. It does not discuss whether the remaining 70 percent of the short term projects identified in the 2004 RTP are now contemplated

to be funded.[1] As for the long term projects (i.e., the High Speed Regional Transport system), the RTP explains that this system would rely exclusively on private financing for development, design, construction, operation and maintenance. RTP at 150. We agree that it is unlikely that public financing will be available for High Speed Regional Transport. Yet, as the Eells' Report notes, the likelihood of such a system being privately financed appears highly speculative as well.

Moreover, while the draft 2008 RTP states that the Plan would have localized ground access impacts at a number of airports (2008 RTP at 110 and 2008 Aviation and Airport Ground Access Report at 12), we cannot locate this impact analysis in either the RTP, the Draft EIR for the RTP or these documents' appendices. In addition, the 2008 Aviation and Airport Ground Access Report (at 13) states that the Airport Ground Access Element for the 2008 RTP updates the list of arterials, interchange and transit improvements recommended by the 2004 RTP. Again, we can not find this "updated list." Nor is it clear whether the Airport Ground Access Element is a separate document from the Aviation and Airport Ground Access Report. This impact analysis and list of transportation improvements would appear to be critical components of SCAG's decentralized aviation strategy and should certainly be included in the RTP and the RTP EIR.

In short, while we understand that RTP's are intended to provide a long term vision for the region's transportation network, we are perplexed - given the fact that SCAG's decentralized aviation strategy appears to be a core component of the RTP - that the Plan lacks any definitive information on short-term ground access projects. Thus, given the overly conceptual nature of the short term ground access projects, coupled with the uncertainty associated with construction and operation of High Speed Regional Transport, we are left with very little assurance that the region's decentralized aviation strategy will come to fruition. Perhaps, as discussed below, the gaps in SCAG's planning may stem from its failure to include aviation-based performance standards in the RTP.

B. The 2008 RTP Lacks Performance Standards Relating to Aviation Strategy.

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[1]In fact, it appears that not all of the airport ground access projects proposed in the 2004 RTP have been funded. According to the Airport Ground Access Report prepared for the 2004 RTP Update, projects totaling about $2.75 billion were identified as Phase 2 (Beyond the RTP). *See* 2004 RTP - Airport Ground Access Report at 45. The 2008 RTP identifies only $2.3 billion in funding for constrained projects (i.e., have funding commitments) and another $2.9 as unconstrained (i.e., do not have funding commitments). 2008 RTP Aviation and Airport Ground Access Report at 13.

State and federal regulations require that program level performance measures that include objective criteria that reflect the goals and objectives of the RTP be utilized in the development and evaluation of the RTP. 2008 RTP EIR at 3.14-19. While the 2008 RTP contains performance measures (referred to in the Plan as "performance outcomes"), these performance outcomes do not appear to contain objective criteria nor do they address the region's aviation strategy or airport ground access at all.[2] Moreover, while the RTP identifies "Aviation Guiding Principles" and "Aviation Action Steps," these principles and action steps - while clearly intended to promote decentralized aviation -are relatively vague and undefined.

For example, one of the Action Steps calls for support for giving priority to key airport ground access projects in the programming of transportation projects in the RTP and RTIP. 2008 RTP at 110. If successfully implemented, this Action Step would certainly facilitate decentralized air travel but we can find no evidence in the RTP that airport ground access projects have been given priority in the RTP or the Regional Transportation Improvement Plan ("RTIP"). Nor can we find any indication as to which criteria SCAG might use to rank the merits of an airport ground access project against a non-airport access project in its transportation programming process. Therefore, without specific airport ground access performance measures, it is not possible to determine the level of commitment to achieving the region's aviation strategy, to monitor the success of ground transportation projects in facilitating the region's decentralized aviation strategy or, given the region's limited financial resources, determine where aviation ground access ranks in comparison to the region's other pressing transportation demands.

C. Additional Information Regarding Airport Ground Access is Needed if the Region is to Succeed in Decentralizing Air Travel.

The 2008 RTP should be revised to include far more specificity regarding the ground access strategy needed to facilitate a decentralized aviation system. As the Eells' Report acknowledges:

> More details are needed regarding the purpose and need for the recommended projects, anticipated completion dates, and projected benefits for airport access and local traffic circulation. An analysis of the effectiveness of the recommended improvements should be conducted to identify areas which may need additional traffic mitigation or improved airport access. Strategies should be developed to secure the additional funding which will be needed to

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[2]While certain of the RTP EIR's performance outcomes relating to mobility and accessibility could facilitate airport access, these performance measures target home-work commute trips rather than airport access.

complete the projects in the Strategic Plan necessary to fully implement the Aviation Decentralization Strategy.

See Eells Report. Beginning where the 2004 RTP left off, SCAG should:

- Identify those highway and arterial improvements, intersection improvements, light and heavy rail extension and linkage to airports including high-speed rail, high-occupancy vehicle ("HOV") extension and linkage to airports, bus service improvements, park-and-ride facilities, and remote terminals linked to airports by rail and HOV connections. Specifically, the 2004 RTP - Airport Ground Access Report, Attachment A - Airport Ground Access Projects should be updated and expanded. This list of ground access projects, completed for the 2004 RTP, contains the most detailed information we could find pertaining to individual projects. This list should be updated to include the following: (1) a description of new or deleted projects; (2) an identification of the status of public funding for each of the projects; and (3) the schedule for implementation of each of the projects.

- Model these various ground access projects to test the effectiveness of the various improvements, with the overall goal of relieving congested bottlenecks and facilitating the transport of passengers and cargo from areas with airport capacity shortfalls to airports with available capacities.

- Identify high-priority projects that would be included in the 2008 RTP and the next RTIP. This identification effort should clearly explain the funding opportunities and constraints associated with each proposed ground access project. One high priority project that deserves considerably more attention in the 2008 RTP is the expansion of the regional system of FlyAways. It is our understanding that SCAG initiated a study in 2007 designed to expand the proposed system of FlyAways. As the Eells' Report states, the RTP should include more details on the proposed FlyAway facilities and operations as well as a strong commitment to implement the program as quickly as possible.

El Segundo strongly urges SCAG to include the detailed information described above in the 2008 RTP. It is our understanding that SCAG staff may have conducted much of this analysis but it has not found its way into the RTP itself. Regardless, access to this information is critical if the public is to fully understand the status of SCAG's decentralization aviation strategy and to identify opportunities to improve upon this important strategy.

4. THE 2008 RTP DEIR IS INADEQUATE AND FAILS TO ANALYZE WHETHER SCAG'S DECENTRALIZED AVIATION STRATEGY WILL BE ACCOMPLISHED.

Given the lack of detail in the RTP, it is not surprising that the DEIR prepared for the 2008 RTP is deficient and fails to comply with CEQA. The RTP DEIR identifies the purpose of the 2008 RTP as providing a clear, long term vision of the transportation goals, policies, objectives and strategies for the SCAG region. DEIR at 2-3. The RTP clearly considers aviation as part of the region's transportation system and specifically includes aviation decentralization as a key strategy of the RTP. DEIR at 2-17. As a result, the DEIR should have comprehensively described the aviation strategy and analyzed whether implementation of the 2008 RTP would accomplish, or begin to accomplish, greater regionalization of air travel. Unfortunately, it does neither.

A. The DEIR Fails to Adequately Describe the Aviation Strategy Component of the 2008 RTP.

The definition of a project's purpose and objectives lays the foundation for the entire EIR. Analyzing and disclosing a project's impacts is essentially meaningless unless it is done with a view to understanding how well the project achieves its objectives, and whether that achievement is worth the environmental and other costs. Perhaps most importantly, as discussed below, an EIR cannot provide a meaningful comparison between the project and various alternative courses of action unless the EIR analyzes the ability of the project to achieve its own objectives. Here, the RTP DEIR fails entirely because it never clearly defines and describes the aviation strategy, including details of the specific ground access projects that would be needed to take pressure off the region's most constrained airports. Thus, the DEIR should have described the key components of SCAG's aviation strategy, including but not limited to the specific ground access improvements, the funding for each of these improvements, likelihood that each of these improvements would actually be implemented and, finally, a schedule for the implementation of these improvements.

We need look no further than the FlyAway program to exemplify the failure of the DEIR to describe key components of the airport ground access system. The 2008 RTP (at 17, 18) states that SCAG is working closely with LAWA on planning and programming a regional system of FlyAways. "The locations of the proposed new FlyAways can be optimized by taking advantage of the region's developing high-occupancy vehicle (HOV) and light and heavy rail networks that can provide direct linkages to Ontario and Palmdale as well as LAX." *Id.* We concur that this FlyAway system is a very important component of the aviation decentralization strategy. It has the potential for expeditiously facilitating the use of underutilized suburban airports with relatively nominal capital or operational outlay. While the DEIR (and, of course the RTP itself) should have provided an extensive description of SCAG's and LAWA's planning

and programming efforts on the FlyAway system, it provides no information other than the brief overview cited above. We expect that SCAG and/or LAWA have ample studies on this important program; this information should have been included in the RTP and DEIR.

Because the DEIR lacks critical information on airport ground access projects, the document provides no evidence that implementation of the 2008 RTP would contribute toward decentralized aviation. In keeping with CEQA's central purpose, it is paramount that the EIR provide a sufficient level of information so that the public and decision makers are able to determine exactly what effect, if any, this Plan would have on the region's ability to accomplish a regional airport strategy.

B. The DEIR Fails to Adequately Analyze the Surface Transportation Impacts Associated With the Region's Airports.

CEQA requires that an EIR be detailed, complete, and reflect a good faith effort at full disclosure. CEQA Guidelines § 15151. The document should provide a sufficient degree of analysis to inform the public about the proposed project's adverse environmental impacts and to allow decision-makers to make intelligent judgments. *Id.* Consistent with this requirement, the information regarding the project's impacts must be "painstakingly ferreted out." *Environmental Planning and Information Council of Western El Dorado County v. County of El Dorado*, 131 Cal.App.3d 350, 357 (1982) (finding an EIR for a general plan amendment inadequate where the document did not make clear the effect on the physical environment).

As discussed above, the 2008 RTP states that the Plan would have localized ground access impacts at a number of airports. 2008 RTP at 110 and 2008 Aviation and Airport Ground Access Report at 12. This analysis of impacts does not seem to have been included in the RTP or the DEIR. If such an impact analysis exists, it must be presented in the EIR itself. *See Santa Clarita Organization for Planning the Environment v. County of L.A.* ("*SCOPE*") (2003) 106 Cal. App. 4th 715, 722 (agency's analysis must be contained in the EIR, not "scattered here and there in EIR appendices").

Because the DEIR contains no analysis relating to airport ground access, it is unclear exactly how or why SCAG determined that the Plan would have localized ground access impacts near airports. Inasmuch as the 2008 RTP assumes the implementation of High Speed Regional Transport in its aviation decentralization strategy, it seems counterintuitive that there would be increased ground access (i.e., arterial or freeway) impacts. Moreover, while the DEIR concedes it does not analyze "strategic projects" such as certain segments of High Speed Regional Transport because their funding and therefore implementation is considered speculative (at 2-4), we can find no logical explanation as to why the DEIR omitted any analysis of the short-term ground access improvements since these projects are far less expensive, are relatively short-term, and thus far more likely to be implemented.

Again, to comply with CEQA's disclosure requirements, the DEIR must be revised in a manner that actually analyzes the effects of the airport ground access strategy. In conducting this analysis, SCAG should rely on the Aviation Policies, Principles and Action Steps identified in the 2008 RTP itself (*See* 2008 RTP at 109). Specifically, if SCAG has used these policies, principles and action steps to formulate certain of its CEQA thresholds of significance, it would then be capable of analyzing how the 2008 RTP accomplishes its goal of decentralized air travel.

C. The RTP and DEIR Should be Revised to Seek Additional Approaches to Facilitating SCAG's Aviation Decentralization Strategy.

El Segundo clearly understands that full decentralization of air travel is only feasible with a system of high speed transport because it would relieve freeway congestion in urbanized areas and make less congested airports more accessible to air travelers. However, the cost of such systems coupled with the unavailability of any public financing, make its implementation within the 2008 RTP planning horizon (2035) entirely uncertain.

Because the RTP's current airport ground access strategy appears to be insufficient to accomplish the goal of aviation decentralization, SCAG must identify other *feasible* approaches to regionalizing air traffic. For example, SCAG must redouble its efforts to expeditiously implement short-term ground access projects such as an expanded FlyAway system to serve emerging suburban airports. In addition, SCAG should evaluate the potential for bus rapid transit to serve underutilized airports and investigate potential light rail, heavy rail and commuter rail extensions to the major airports in the region.

The revised RTP and EIR should also provide more information regarding the role that LAWA and airlines can play in the region's aviation strategy. In addition to being willing to invest in new flights at emerging airports, LAWA could participate in funding High Speed Regional Transport and other ground access projects with an increase in airport passenger facility charges. Moreover, SCAG should work closely with LAWA and airlines to evaluate aviation demand management measures such as peak hour pricing (i.e., passengers pay much higher fees to travel during peak ground transportation peak hours) or scheduling more flights during off-peak hours. Finally, LAWA and airlines could charge less per ticket for passengers traveling at underutilized airports.

D. The DEIR Must Be Revised and Recirculated.

Given the foregoing deficiencies, the RTP DEIR must be revised and recirculated. Based on the inadequacies discussed above, the DEIR cannot properly form the basis of a final EIR. CEQA and the CEQA Guidelines describe the circumstances which require recirculation of a draft EIR or circulation of a supplemental draft EIR. Such circumstances include adding

significant new information to the EIR after public notice is given of the availability of the DEIR but before circulation, and where the DEIR is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. CEQA Guidelines § 15088.5. "Significant new information" includes the identification of new significant impacts, a substantial increase in the severity of identified significant impacts, and the mitigation measures that could reduce impacts below a level of significance. *Id.*

5. CONCLUSION

For the foregoing reasons, the City of El Segundo respectfully requests that SCAG delay further action on the proposed 2008 RTP until such time as: (1) the Plan is revised to provide the much needed detail on the airport ground access strategy; and (2) SCAG prepares and circulates a revised draft environmental impact report that fully complies with CEQA and the CEQA Guidelines.

The City of El Segundo also commends SCAG for promoting an aviation decentralization strategy and for institutionalizing an upper limit of 79 MAP at LAX through 2035. The City strongly supports SCAG in its efforts to promote a regional approach to accommodating long-term aviation demand, and will continue to assist in the achievement of that goal.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Laurel Impett by OLW

LAUREL L. IMPETT, AICP, Urban Planner
OSA L. WOLFF

Exhibit – John Eells Report, February 11, 2008

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REVIEW OF ABILITY OF 2008 SCAG REGIONAL TRANSPORTATION PLAN TO IMPLEMENT AVIATION DECENTRALIZATION STRATEGY

JOHN EELLS

TRANSPORTATION AND
GOVERNMENTAL AFFAIRS
CONSULTANT

February 11, 2008

The purpose of this report is to evaluate the ability of the SCAG 2008 Regional Transportation Plan (RTP) to implement the SCAG Aviation Decentralization Strategy. The report provides an overview of the updated Aviation Decentralization Strategy in the Draft RTP and examines the effectiveness of the proposed short term and long term airport ground access improvements in achieving the goals of the Aviation Strategy.

SCAG Aviation Decentralization Strategy

SCAG adopted an Aviation Decentralization Strategy in the 2004 RTP as the cornerstone of its overall approach to accommodating a projected doubling of air passenger demand to 170 million annual passengers (MAP) by 2030. SCAG recognized that while the four main urban airports in Los Angeles and Orange Counties are highly constrained, the emerging suburban airports in San Bernardino County, Riverside County, and North Los Angeles County can accommodate the projected growth in aviation demand. Ontario International Airport can accommodate a major increase in annual passengers from 7.2 MAP currently up to 30 MAP by 2035. Palmdale Airport, San Bernardino International, March Inland Port, and the Southern California Logistics Airport not only have ample capacity available for future growth, they can serve future demand with far fewer environmental impacts then would occur at LAX, Bob Hope, Long Beach and John Wayne airports.

The Draft SCAG 2008 RTP states that it incorporates and updates the Aviation Decentralization Strategy adopted in the 2004 RTP. The Decentralization Strategy embodied in the Draft 2008 RTP respects all of the physical capacity constraints at the urban airports as well as the legally enforceable limitation on future growth at the John Wayne and Long Beach airports. More specifically, the Draft 2008 RTP proposes to limit future growth at the urban airports in Los Angeles and Orange Counties to 78 MAP for LAX, 10.8 MAP at John Wayne, 9.4 MAP at Bob Hope and 4.2 MAP at the Long Beach Airport.

The Aviation Decentralization Strategy in the Draft RTP assumes the airlines will be more willing to invest in new flights at the emerging suburban airports. The Decentralization Strategy also recognizes that the challenge of meeting future aviation demand in the SCAG region is inextricably tied to improved ground access to the suburban as well as the urban airports.

In order to meet future aviation demand in the region, it will be necessary to get future air passengers from the urban areas in Los Angeles and Orange Counties to the available airport capacity at the suburban airports in San Bernardino County, Riverside County, and North Los Angeles County. By 2035, 82% of the commercial aviation demand is still expected to be generated in Los Angeles and Orange Counties (down from 90% currently). With the overwhelming majority of the aviation demand remaining in Los Angeles and Orange Counties, millions of annual passengers will need to utilize the emerging suburban airports rather than the highly constrained urban airports located closer to where they live and work.

The Aviation Decentralization Strategy proposed in the Draft 2008 RTP recommends that substantial airport ground access improvements be implemented throughout the region to make it easier and more convenient for passengers to get to the emerging suburban airports. The short

term program focuses on relieving traffic bottlenecks around airports with arterial, intersection, and interchange improvements as well as improving transit service to airports. The short term program includes planning and implementing a regional system of FlyAways to provide direct bus or rail access to airports as well as working with the recently re-activated Southern California Regional Airport Authority (SCRAA) to facilitate key ground access improvements.

The Aviation Decentralization Strategy in the Draft RTP proposes to implement a High Speed Regional Transport (HSRT) system as the cornerstone of its long term approach for improving ground access to the emerging suburban airports. The Aviation Strategy incorporates the Initial Operating Segment (IOS) of the proposed HSRT system from West Los Angeles to the Ontario Airport as well as the extensions west to LAX and east to the San Bernardino International Airport.

The following sections of this report review the proposed short term and long term airports ground access improvements in more detail and provide an initial review of their potential effectiveness in achieving the goals of the SCAG Aviation Decentralization Strategy.

Short Term Airport Access Improvements

The RTP states that implementation of the Aviation Decentralization Strategy will result in localized ground access impacts at a number of airports, particularly the Ontario, San Bernardino and Palmdale airports. The 2004 RTP included a number of arterial, intersection, interchange, and transit improvements designed to accommodate increases in passenger and cargo activities while maintaining the acceptable levels of service on the roadways surrounding the airports. The RTP indicates that the list of local ground access improvements recommended in the 2004 RTP has been updated for the 2008 RTP following extensive input from local aviation and transportation planning staff from airports, cities, and counties throughout the region.

The airport ground access projects recommended in the financially constrained 2008 RTP are limited to those projects which have funding commitments. The recommended projects which do not have funding commitments are included in the 2008 SCAG Strategic Plan which is not financially constrained. The total cost of the recommended ground access projects in the 2008 RTP is $2.3 billion, and the total cost of all the recommended projects including the unfunded projects in the Strategic Plan is $5.2 billion.

Neither the Draft RTP nor the Aviation and Airport Ground Access Report provide sufficient details on the proposed local airport access improvements to evaluate their effectiveness in improving airport access and mitigating the local traffic impacts resulting from implementation of the SCAG Aviation Decentralization Strategy. More details are needed regarding the purpose and need for the recommended projects, anticipated completion dates, and projected benefits for airport access and local traffic circulation. An analysis of the effectiveness of the recommended improvements should be conducted to identify areas which may need additional traffic mitigation or improved airport access. Strategies should be developed to secure the additional funding which will be needed to complete the projects in the Strategic Plan necessary to fully implement the Aviation Decentralization Strategy.

The Draft RTP notes that SCAG is working with the newly re-activated Southern California Regional Airport Authority (SCRAA) to facilitate implementation of airport ground access improvements. The RTP needs to be more specific in identifying what the roles and responsibilities of SCAG and the SCRAA will be in implementing the Aviation Decentralization Strategy. The primary mission of the SCRAA needs to be redefined to focus on managing aviation demand, improving ground access to the underutilized suburban airports, and pursuing additional funding for ground access improvements. The efforts to secure additional funding should include legislative initiatives aimed at allowing revenues from the Airport Improvement Program and Passenger Facility Charges to be used for ground access improvements. The SCRAA has made little progress since it was re-activated in 2006 and may be on the brink of disbanding. If the SCRAA is unable to provide effective leadership in facilitating the regional efforts to achieve aviation decentralization, then SCAG will need to step up and provide this much needed leadership.

The Draft RTP also indicates that SCAG is working with the Los Angeles World Airports (LAWA) on the implementation of an expanded regional system of FlyAways where airline passengers park their cars at regional FlyAway facilities and then take buses or trains to the airport. The location of the FlyAway facilities will be optimized to take full advantage of the regions expanding High Occupancy Vehicle (HOV), light rail and heavy rail networks to provide direct connections to the LAX, Ontario, and Palmdale airports.

Although not discussed in the 2008 RTP, it is my understanding that SCAG initiated a study in 2007 designed to expand the proposed system of FlyAways to provide convenient access to suburban airports as well as LAX. This expansion of the program beyond LAX will enable it to play a key role in the implementation of the Aviation Decentralization Strategy. The expanded program could be critically important in improving both airport access and local traffic circulation in the areas surrounding the airports. The program deserves more attention in the RTP as well as a higher priority in both the short term and long term strategies for implementing regional aviation decentralization. The RTP should include more details on the proposed FlyAway facilities and operation as well as a strong commitment to implement the program as quickly as possible.

Long Term Airport Access Improvements

The Draft 2008 SCAG RTP emphasizes that one of the main challenges in meeting aviation demand in the region over the long haul will be getting future air passengers from the urban areas in Los Angeles and Orange Counties to the airports with available capacity in the Inland Empire and North Los Angeles County. The cornerstone of SCAG's long term strategy for achieving regional aviation decentralization is to implement a comprehensive High Speed Regional Transport (HSRT) system to make the Ontario, Palmdale, and San Bernardino airports more accessible to airline travelers throughout the region. The HSRT system would connect these airports with LAX and thereby allow them to operate efficiently as a single airport system with multiple remote terminals.

The HSRT system would improve the operation of the regional aviation system by enhancing airport access and connectivity and allowing thousands of airline passengers to bypass the highly congested highway network. The HSRT system would play a crucial role in achieving the goals of the SCAG Aviation Decentralization Strategy by improving access to the Ontario, Palmdale, and San Bernardino airports.

In addition to connecting key airports in the region, the HSRT system would also connect the San Pedro Bay ports with an inland port facility and link major urban activity centers throughout the region to provide an attractive alternative to the automobile for commuters. Traffic congestion would be reduced on numerous highways, accessibility between activity centers would be enhanced, and air and noise pollution from automobiles would be significantly reduced.

The HSRT system would be developed in multiple stages. The Initial Operating Segment (IOS) would run 54 miles from West Los Angeles to the Ontario Airport. Total travel time along the route would be 33 minutes with a top speed of 250 miles per hour and an average speed of 100 miles per hour including dwell times at stations. The LAX segment would extend the HSRT system 8 miles along the I-405 freeway from West Los Angeles to LAX. Total travel time between the LAX and Ontario Airports would be 40 minutes. The remaining segments of the system would extend from Ontario Airport to San Bernardino International Airport, from Union Station in Downtown Los Angeles to the Palmdale Airport, and from the IOS line to the San Pedro Bay ports. The system would utilize either high speed steel wheel on steel rail trains similar to those operating in Europe or Japan or a high speed Magnetic Levitation (Maglev) system which uses magnetic forces to levitate and propel vehicles on an elevated guideway.

The Draft 2008 SCAG RTP includes the Initial Operating Segment (IOS) of the proposed HSRT system from West Los Angeles to the Ontario Airport plus the extensions to LAX and the San Bernardino International Airport. The financially constrained RTP assumes that the "Extended IOS" can be financed with funding which is reasonable expected to be available between 2008 and 2035. The remaining segments of the proposed HSRT system are included in the long range SCAG Strategic Plan which is not financially constrained.

The estimated capital cost of the "Extended IOS" HSRT system is approximately $11 billion and the annual operating cost is estimated to be $110 million per year. The capital cost of the entire HSRT system is estimated to be $27.5 billion and the annual operating cost is estimated to be $598 million per year. The SCAG RTP assumes that the "Extended IOS" system from LAX to San Bernardino Airport as well as the entire HSRT system can be privately financed with no public funding. The RTP utilizes "Business Plan" approach to financing to determine the passenger fares and freight fees that would be needed to design, build, maintain, and operate the HSRT system with no public funding. The RTP concludes that the system could be financed with freight fees and one way passenger fares averaging $17 to 32 to achieve internal rates of return of 5% to 11% for private investors.

The conclusions in the Draft RTP that the HSRT system can be financed entirely with private investment with no public subsidies are based on a Business Plan prepared by the IBI Group in 2007. The analysis in the IBI Business Plan indicated that the revenue from cargo fares

and passenger fares could provide a very good rate of return on private investment even after covering billions of dollars in capital costs and hundreds of millions of dollars in annual operating costs.

The high revenue projections in the Business Plan are based on a fundamental assumption that passengers on the HSRT system will be willing to pay a substantial premium for the speed, convenience, and reliability provided by the HSRT system. While airline passengers may be willing to pay such a high premium for periodic trips to the airport, it is a whole different question as to whether commuters would be willing to pay such a high premium on a daily basis.

The SCAG RTP notes that the HSRT system is likely to become increasingly competitive with driving for commuters as traffic congestion continues to worsen and the cost of driving a car continues to rise. Commuting on the HSRT system could be considerably faster and more reliable than driving along on heavily congested freeways. Nevertheless, the question still remains as to whether commuters will be willing to pay such a high price to bypass congestion. The average fares on the HSRT system would be nearly 10 times the average fares on the public transit services currently being provided by Metro buses and trains throughout the region. Commuting on the HSRT system could cost passengers over $1,000 per month.

The assumptions in the HSRT Business Plan and the SCAG RTP regarding the ability of the high speed system to be self financing with no public funding may be overly optimistic. There is limited experience in California with toll lanes and "HOT lanes" where commuters can pay to by-pass congestion. There is no experience yet in California with commuters paying high fares on a high speed rail system to bypass congestion. If the "Business Plan" approach to financing the HSRT system proves to be overly ambitious, it is unclear whether the HSRT system could still be entirely financed with private investment, and if not, how much public funding would be needed to make the system financially sustainable. Consequently, SCAG needs to be actively pursuing alternative funding strategies for the HSRT system including possible financial contributions from the airlines.

Conclusions

The ability of the Draft 2008 SCAG Regional Transportation Plan to implement the SCAG Aviation Decentralization Strategy is highly questionable. The status of the recommended short term airport ground access improvements is not spelled out in the Draft RTP. More details are needed on these projects including funding commitments, anticipated completion dates, and projected benefits for airport access and local traffic circulation.

The ability of the re-activated Southern California Regional Airport Authority to effectively manage aviation demand and encourage airline participation in the funding of ground access improvements is very much in doubt. The disbanding of the SCRAA would leave a critical void in the regional efforts to facilitate aviation decentralization.

The level of SCAG commitment to a comprehensive system of FlyAways to the emerging suburban airports as well as LAX is not clearly spelled out in the Draft RTP. More

details are needed on the proposed FlyAway facilities and operations, implementation schedules, funding commitments, and projected benefits for airport access and local traffic circulation.

SCAG needs to develop a more comprehensive long term approach to achieving aviation decentralization which is not so dependent on a privately financed HSRT system which may or may not actually get built. More specifically, SCAG needs to:

- Increase its level of commitment to a comprehensive FlyAway program serving the emerging suburban airports as well as LAX;
- Evaluate possible light rail, heavy rail and commuter rail extensions to the major airports in the region;
- Consider implementing a comprehensive Bus Rapid Transit (BRT) system serving major airports; and
- Work closely with the airlines to manage aviation demand and facilitate airline funding participation in ground access improvements and the HSRT system should the SCRAA continue to falter or disband altogether.

BY PERSONAL DELIVERY AND EMAIL

February 19, 2008

Regional Council
Southern California Association of Governments
c/o Hasan Ikhrata, Executive Director
818 W. 7th Street, 12th Floor
Los Angeles California 90017

Re: Comments Draft PEIR for the 2008 RTP.

To the Members of the Regional Council:

The Endangered Habitats League (EHL) submits the following comments on the SCAG Draft Programmatic Environmental Impact Report (DPEIR) for the 2008 Regional Transportation Plan. EHL also submits some initial comments about the 2008 RTP federal law compliance strategy, specifically as it relates to the requirement of fiscal constraint. As discussed below, EHL cannot support the current draft of the 2008 RTP and the DPEIR.

1. The Challenges of the Existing Regional Environmental Setting

SCAG has done an admirable job describing the existing regional environmental setting and of setting forth the challenges of planning for growth in the Southern California region. Its discussion underscores the compelling need for greater regional and interregional coordination among land use and environmental regulatory authorities.

Many of the new transportation facilities proposed in the 2008 RTP are understandable--yet ultimately short-sighted--reactions to congestion from unsustainable auto-dependent growth patterns throughout the region, patterns resulting from thousands of local land use decisions over the years . Local jurisdictions jealously guard their virtually exclusive jurisdiction over land use, but the resulting piecemeal planning creates regionally insurmountable problems that existing

regional entities are simply powerless to fix.

After nearly two decades of advocacy at all levels of government, EHL has concluded that this needed coordination will not occur in any meaningful way without the appropriate intervention of the state, and *EHL looks to the SCAG Regional Council to support reasonable state land use legislation reform to incentivize local jurisdictions to plan for efficient transportation and land use solutions. SB 375 constitutes one such reasonable solution.*

Unless local jurisdictions take the lead in planning for efficient growth patterns with the support of the state, SCAG will remain locked in this reactive mode, responding to the latest congestion nightmare that has already come or lies just beyond the horizon. For this reason, and as discussed below, EHL cannot support the current draft of the 2008 RTP and the DPEIR.

2. The Proposed Project.

The 2008 RTP Project appears to consist of two elements: (1) a series of transportation-related infrastructure investments across modes designed to both support and augment existing regional transportation capacity and (2) alterations in existing and projected planned land uses in 2 percent of the SCAG land area designed to reduce overall travel demand and to make more efficient use of existing and planned infrastructure, and known as the Compass Blueprint regional growth strategy.

As for the first element of the Project, it is generally well-defined. It is also well within SCAG's discretionary authority to implement. SCAG is therefore well within its authority under CEQA to assume lead agency status.

SCAG's authority to implement the second element of the Project–Compass Blueprint--is less clear. CEQA requires that the lead agency have the authority to "carry out" the project. (CEQA Guidelines, § 15051(b).) The dictionary defines "to carry out" as "to put into operation; execute; to effect or accomplish; complete." (Random House Websters College Dictionary.) SCAG has no land use authority. It is therefore unclear how it intends to "carry out" this element of the Project within the meaning of CEQA. SCAG should clarify the basis of its discretionary authority to act as lead agency for this part of the project.

Furthermore, to the extent the Compass Blueprint program is a component of the Project, the Project and proposed mitigation for Project *impacts* have been improperly conflated, potentially in violation of CEQA. Specifically, the proposed Project "contains transportation and urban form strategies, [i.e., the Compass Blueprint 2% strategy] that encourage compact growth, increased jobs/housing balance and centers-based development, where feasible, in all parts of the region." (1-3.) This very same Compass Blueprint strategy, however, is also proposed

mitigation for the proposed project, leading to "double counting" of impact reductions in violation of CEQA.

For example, Mitigation Measures MM-OS.33 and MM-OS.27 propose that the Compass Blueprint program be adopted to mitigate the significant impacts on open space of the Proposed Project--which *itself already assumes* implementation of Blueprint program. (See also MM-POP.4 [same]; MM-SEP.20 [same]; MM-LU.6 [same]. *But the benefits of Compass Blueprint have already been credited in the baseline in assessing the impacts of the project*.

Specifically, the 2008 RTP DPEIR states that:

> "The RTP includes growth polices from the Compass Blueprint that encourage a more compact landform, with growth focused at transit nodes, centers and in areas to balance out the ratio of jobs to housing. This growth pattern results in substantially less consumption of vacant, open space/recreation and agricultural land compared to the No Project (referred to as Baseline growth forecast in the Plan) -- 200,000 acres compared to up to 655,000 acres under the Plan." (1-3 to 1-4.)

Because the mitigation is intended to offset the impact from the RTP–as opposed to the No Project--the Compass Blueprint cannot legitimately be characterized as mitigation without double counting.

3. Project Alternatives Are Not Presented.

The overwhelming focus of the 2008 RTP Project is the series of transportation-related infrastructure investments across modes designed to both support and augment existing regional transportation capacity. The second element–the Compass Blueprint regional growth strategy–is at best an ancillary part of the project, and likely is beyond the authority of SCAG to implement. Yet the alternatives section of the DPEIR devotes all of its effort to considering alternatives to the second element.

Literally *no* effort is made to develop, discuss and consider *alternative transportation investment strategies*, even though RTP development and approval is the core element of the Project, and even though RTP development constitutes the essence of SCAG's discretionary authority. This failure renders the DPEIR invalid under CEQA.

The DPEIR states that

> "The alternatives evaluated include:
> (1) The **Proposed 2008 Plan** is a blueprint to help achieve a coordinated and balanced

> regional transportation system. The Plan contains transportation and urban form strategies that encourage compact growth, increased jobs/housing balance and centers-based development, where feasible, in all parts of the region. The proposed Plan is fully described in the Project Description.
> (2) The **No Project Alternative** includes only those transportation projects that were programmed and/or received federal environmental clearance by December 2006, and projects in the first year of the 2006 TIP and projects under right-of-way acquisition or under construction. *These reasonably foreseeable projects fulfill the definition of the mandated CEQA No Project Alternative (CEQA Guidelines § 15126.6(e)).*
> (3) The **2004 Modified RTP** Alternative is an update of the adopted 2004 RTP to reflect the most recent growth estimates and transportation planning decisions and assumptions. This alternative does not include all the urban form strategies included within SCAG's Compass Blueprint to the extent included within the Plan.
> (4) The **Envision** Alternative builds on the enhanced density and ideas of the SCAG Compass Blueprint and described in the Plan and goes further. It includes far more aggressive densities than the proposed plan and limits the single family housing that would be built in the region.
>
> "Each alternative maintains a constant total for population, households and jobs for the region in 2035. The year 2035 growth projections for each alternative differ only in the distribution of people, households and jobs such that some counties have higher totals for a given alternative while other counties will have lower totals. The alternatives differ in terms of the distribution because the different transportation investments and urban form strategies would be expected to support different regional distributions of population, households and employment." (1-3.)

In essence, the DPEIR contains two proposed transportation networks: doing nothing (no project) and the Plan.[1] For example, no effort was made to explore the consequences of increasing transit investment at the expense of new highways under a given land use scenario, limiting investment to existing corridors, of emphasizing the use of innovative para-transit strategies, the potential role of existing road pricing and increasing transportation systems management investment. This "take-it-or-leave-it" approach is not the reasonable range of alternatives required under CEQA.

Thus, while EHL applauds SCAG for its innovative role in exploring the role that land use reform plays in reducing travel demand, this emphasis should not be at the expense of its

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[1] "Both the Envision Alternative and the Plan have the same transportation network." (4-21.)

disregard of the role that transportation investment decisions play in determining urban form, and of SCAG's authority in shaping these decisions. SCAG's inadequate alternatives analysis of the 2008 RTP DPEIR reflects this disregard.

4. Impact Analysis

The DPEIR correctly notes that "the population growth projected by 2035 in combination with the projects in the 2008 RTP would consume approximately 2,000,000 acres of land that is currently vacant." (ES-12.) This development will result in massive impacts to the environment in virtually every category and contrasts with the overall visual character of the existing landscape setting.

EHL applauds SCAG's frank recognition of the extensive nature of the impact on the environment in all relevant areas after implementation of the 2008 RTP and associated growth occurs.

Air Quality

The DPEIR correctly notes that **"**[e]missions of particulate matter are directly related to growth and VMT. Regardless of how clean a vehicle operates, the vast majority of PM10 and PM2.5 emissions from on-road sources are generated from re-entrained dust on paved roads and is a function of the vehicle miles traveled." (3.2-24.) Nonetheless, implementation of the proposed project will result in substantial absolute increases in total VMT in the region.

5. Environmentally Superior Alternative

As shown above, SCAG's failure to exercise its authority under state and federal law to explore transportation investment alternatives precludes a reliable determination of a feasible environmentally superior alternative. It is likely that the No Project alternative will result in unacceptable congestion and other impacts. But is its also likely that a feasible, environmentally superior alternative to the 2008 RTP can be developed by incorporating proven strategies, some of which have been endorsed by SCAG staff. These include:

(1) Condition inclusion of local and subregional infrastructure investment in RTPs on local government support of legislation implementing a carbon-based VMT charge on private autos, with revenues to support system maintenance and public transit;
(2) Condition inclusion of local and subregional infrastructure in RTPs on local government support of real-cost parking management and fee structures, with revenues to provide equity mechanism;
(3) No net VMT growth test for additional general purpose lane capacity

(4) Local government commitment to implement Blueprint strategies.
(5) Completion of westbound Red Line to Ocean
(6) Deregulation of private transit
(7) Increased funding for surface transit

Only if the DPEIR considers these and other strategies can a defensible conclusion that the environmentally superior alternative has at least been considered.

6. Mitigation Is Someone Else's Responsibility.

In general, the DPEIR exhorts other entities to implement mitigation, rather than proposing mitigation as part of the 2008 RTP planning process:

> "Mitigation Measures proposed in this PEIR can be incorporated as policies in the Final 2008 RTP and will help ensure that feasible mitigation measures are implemented at the project level. *The implementing agencies and local Lead Agencies shall be responsible for ensuring adherence to the mitigation measures as RTP projects are considered for approval over time.* Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process." (1-4, emphasis added.)

While EHL commends SCAG for its comprehensive effort to suggest mitigation for other agencies to implement, the same level of effort is not made to determine measures that SCAG itself can implement through its own authority as a planning agency under federal and state law.

"SCAG is the federally designated Metropolitan Planning Organization under Title 23, USC § 134(g)(1), for the six-county region. SCAG is required by state and federal mandates to prepare an RTP every four years." (2-4.) SCAG has the discretionary authority and responsibility to select projects for inclusion into the Regional Transportation Plan, and to develop Transportation Control Measures under the federal Clean Air Act. (42 U.S.C. § 108(f).) SCAG also has planning authority under the SAFETEA-LU.

Air Quality, Energy, Transportation, and GHG Emissions

SCAG acknowledges the massive impacts on Air Quality, Energy and Greenhouse Gas Emissions of the 2008 RTP. Specifically, "[i]n 2035 there would be substantially more total daily Vehicle Miles of Travel (VMT) than the current daily VMT. Implementation of the 2008 RTP would contribute to this increase." (ES-68, 3.14-21.) As the DPEIR acknowledges, "[t]he 2008 RTP, by increasing mobility and including land-use-transportation measures, influences the pattern of ... urbanization." (ES-43, ES-58, ES-62, ES-67.)

This inability to meet AB 32 mandated objectives is largely attributable to VMT growth. Indeed, "it is unlikely that mitigation measures would reduce GHG emissions below existing conditions (let alone to 1990 levels as required by AB 32) due to anticipated population growth" (ES-17.) In addition, the DPEIR observes that "[t]he implementation of the 2008 RTP is likely to substantially increase the consumption of electricity, natural gas, gasoline, diesel, and other non-renewable energy in the operation of the transportation system." (ES-35.)

Unlike in many other areas of concern, SCAG has the ability and authority to implement feasible strategies--through the regional transportation planning process--to adopt alternatives and measures to avoid or mitigate the VMT increases that are the root cause of increased particulate emissions, and transportation, energy and GHG impacts.

But the DPEIR does not adequately address SCAG's planning authority to reduce these impacts, relying instead on a mere listing of existing measures from applicable and proposed air plans, TCMs from section 108 of the federal Clean Air Act, existing and proposed ARB tailpipe emissions standards, and hoped-for measures from local jurisdictions and project sponsors. (ES-13 to 14, ES-17, ES-29, ES-35 to 38.) In the case of energy consumption, SCAG improperly defers any real measures until the next RTP cycle. ("SCAG shall continue to consider energy uncertainty impacts prior to the development of the next Regional Transportation Plan" [ES-35, ES-48].)

The DPEIR concludes that "[e]ven with implementation of all feasible mitigation measures and incorporation of measures as described above, regional emissions of PM10 and PM2.5 would increase substantially in the region." (3.2-31.) But where is the discussion showing that SCAG has exercised its planing authority to the fullest extent feasible?

EHL believes that SCAG can feasibly do more, and do more now, to reduce these impacts. These feasible measures can be classified into two broad groups.

(1) **Infrastructure Selection**

EHL fully supports the significant portion of available funding that is dedicated to the maintenance and preservation of existing infrastructure. SCAG has the discretion and authority to ensure that provision of new infrastructure not result in an increase in net VMT, and to ensure that the conceptual alignment does not directly and indirectly (through growth) impact sensitive habitat. EHL requests that SCAG exercise this authority when deciding to include new infrastructure in the RTP.

(2) **Land Use**

The DPEIR states that "[t]hrough the integration of land use planning and transportation infrastructure investments, land use strategies can encourage development patterns that increase transportation options and the use of alternate modes of travel to reduce vehicle miles traveled." (2-7.) Specifically, "[c]ompared to the "baseline" growth forecast, the adopted land use strategy reduces travel by more than 20 million vehicle miles traveled (VMT) per day (**Figure 2-1**), eliminates about 0.9 million hours of travel per day (**Figure 2-2**) and reduces daily congestion delay by 0.5 million hours (**Figure 2-3)**." (2-12.) Moreover, "the "4D" model is capable of yielding an additional reduction of 8.6 million daily VMT region-wide *in addition to* the 19 million daily VMT reduction modeled by SCAG." (2-12, emphasis added.)

Clearly, the problem with land use strategies is not one of effectiveness, it is one of implementation. Under the status quo, local governments have no obligation, or even an incentive, to conform their land use decisions to meet regional growth strategies. Until such a commitment or incentive exists that reasonably assures local government implementation, the RTP should defer taking credit for any VMT reduction benefits.

Biological Resources

The DPEIR acknowledges that "Transportation projects included in the 2008 RTP on previously undisturbed land could displace natural vegetation, and thus habitat, some of which is utilized by sensitive species in the SCAG region." (ES-18.) It also states that "The 2008 RTP would potentially contribute to the fragmentation of existing habitat, decreasing habitat patch sizes, reducing habitat connectivity, and causing direct injury to wildlife. The 2008 RTP includes new transportation corridors that may form barriers to animal migration or foraging routes." (ES-27.) Finally, "[t]he 2008 RTP's influence on growth patterns contributes to regional cumulatively considerable impacts to open space and result in a loss of open space and agricultural lands in the region." (ES-56.)

Instead of examining its ability to exercise its own authority in the planning development process, SCAG relies on project sponsors and local jurisdictions to mitigate these impacts *after* the fact. SCAG ignores the fact that it has the ability to exercise its transportation planning authority not to propose or adopt projects into the RTP whose conceptual alignments clearly traverse high quality undisturbed habitat areas, and consume directly or indirectly large quantities of valuable open space.

The DPEIR also states that "[t]he 2008 RTP is not in conflict with any adopted Habitat Conservation Plan or Natural Communities Conservation Plan" and thus no mitigation measures are necessary." (ES-29.) But SCAG make not make any apparent attempt to ensure that

projects, when considered with their indirect impacts, that SCAG proposes to adopt into the RTP are consistent at a large-scale planning level with adopted and proposed regional habitat conservation plans. Instead, it proposes merely that *after* adoption, "[f]uture impacts to biological resources *shall be* minimized through cooperation, information sharing, and program development as part of SCAG's regional planning efforts. SCAG *shall* consult with the resource agencies, such as USFWS and CDFG." (ES-30.) The problem is, "after" adoption is too late in many cases to avoid significant environmental harm.

7. Significance After Mitigation

Almost across the board, the DPEIR recognizes that environmental impacts from 2008 RTP mitigation will remain significant even after mitigation. In general, EHL applauds this recognition.

The problem is, however, that merely recognizing significant impacts takes a distant second place to avoiding them in the first place. Adoption of some of the approaches suggested above regarding alternatives, additional transportation strategies, and the lawful exercise of SCAG's authority to exclude projects from the RTP could well result in significant environmental benefits even compared with the 2008 RTP.

8. Fiscal Constraint Requirements

As SCAG staff well knows, federal law requires that the fiscally constrained portion of the 2008 RTP be supported by a demonstration that the funding for the projects in the plan, when taken as a whole, is "reasonably available." The 2008 RTP does not measure up to those standards.

Specifically, DOT regulations require that Regional Transportation Plans be supported by "[a] financial plan that demonstrates how the adopted transportation plan can be implemented." (23 C.F.R § 450.322(a)(10).) Further, "[i]n the case of new funding sources, strategies for *ensuring* their availability shall be identified." (23 C.F.R 450.322(a)(10)(iii), emphasis added.)

The fiscal constraint requirement is intended to ensure that metropolitan long-range transportation plans, TIPs, and STIPs reflect realistic assumptions about future revenues, rather than being lists that include many more projects than could realistically be completed with available revenues. Accordingly, EPA's transportation conformity regulations specify that an air quality conformity determination can only be made on a fiscally constrained long-range transportation plan. (See 40 CFR § 93.108.)

The 2008 RTP relies on several new sources of funding, including approximately $ 26

billion from the imposition of tolls to finance the construction and operation of several new mixed-flow lane highways in new alignments throughout the SCAG region:

> "Within the time horizon of the 2008 RTP, additional toll road facilities are expected to be implemented, including the I-710 Tunnel Gap Closure (I-710/Valley Blvd to California Blvd/Pasadena Ave), the I-710 South Corridor (dedicated lanes for clean technology trucks from the Ports to the SR-60 Interchange), the High Desert Corridor (I-5 to US-395), and the CETAP Riverside County to Orange County Corridor."

Appendix B of the 2008 RTP, at Table 3.3, further states:

> "Highway Tolls **Description:** Toll revenues generated from I-710 tunnel. Also, tolls assumed for the I-710 dedicated truck lanes, High Desert Corridor, and CETAP Corridor **Assumptions:** Toll revenues based on recent feasibility studies for applicable corridors. Also includes toll revenue bond proceeds. $26.0 Billion"

Recognizing that *simply assuming* that these corridors can credibly be financed purely through the imposition of tolls is insufficient to meet the fiscal constraint requirement, the 2008 states:

> "The financing of toll road facilities has become sophisticated in recent years, with increasing levels of participation by the private sector. *SCAG is fully aware of the need to carefully consider the economics of specific projects as there is not a "one size fits all" solution.* Various toll road financing models are being evaluated including public and private concessions, shadows [sic] tolls, and direct user paid tolls. For purposes of developing the 2008 RTP financial plan, projections of traffic and revenue generation potential were based on a review of toll feasibility studies and consideration of comparable facilities. Revenue potential from tolling new facilities depends on several factors including length of lanes, configuration of the facilities, and tolling policy. *Documentation on reference sources utilized to analyze toll revenue potential is included in Appendix B.* Additional financial feasibility work for specific facilities is included in this Appendix F." (Appendix F, Emphasis added.)

As noted above, the reader is referred to "documentation on reference sources utilized to analyze toll revenue potential" on these corridors that is "included in Appendix B." But a review of Appendix B reveals no studies or reference sources showing that sufficient toll revenue is "reasonably available." It simply states that "[t]oll revenues [are] based on recent feasibility studies."

But where are these feasibility studies and what to they show? While Appendix B *does*

refer to and rely on *traffic* forecasts for the various new corridors assumed to be financed with tolls, there is no evidence that the demand for these facilities *as toll roads* was ever assessed. Nor is there *any* evidence showing that sufficient numbers of drivers *would be willing to pay a toll high enough to generate the assumed $ 26 billion plus interest in revenue necessary to construct these facilities*.

Studies relating to the performance of the Orange County tollroads and to the State Route 91 median toll lanes, cited by the 2008 RTP, also do not demonstrate the potential feasibility of entirely *different* alignments in *different* regions of Southern California and on projects (such as tunnels) with entirely distinct cost characteristics. SCAG itself admits that it *"is fully aware of the need to carefully consider the economics of specific projects as there is not a "one size fits all" solution."* (Appendix F, Emphasis added.) At best, these Orange County studies show that toll roads in these *other* locations have worked, but even there the record is mixed. Despite confident projections to the contrary, for example, the San Joaquin Hills Toll Road in high-income coastal Orange County has been a colossal financial failure, relying on a series of loans and refinancings to stay alive.

There is yet another reason why tolls for general purpose "mixed flow" lanes on these facilities cannot be determined to be "reasonably available"–there is no legislation permitting it. Indeed, the only legislation cited by the 2008 RTP in support of its financial plan specifically *excludes* such lanes from tolls. Assembly Bill 1467 states that the tolls it authorizes shall finance projects "primarily designed to improve goods movement, including, but not limited to, exclusive truck lanes and rail access and operational improvements." (Legislative Counsel's Digest.) Section 143(e)(4) of the Street and Highways Code now specifically states that "[t]olls and user fees may *not* be charged to noncommercial vehicles with three or fewer axles." If tolls cannot be levied on passenger cars–i.e., vehicles with three or fewer axles–then how can this legislation support the fiscal constraint demonstration?

Finally, the strategic plan submitted for these projects only serves to underscore the work that SCAG failed to require before they could be considered "fiscally constrained." It shows that there is no legislation even proposed to authorize such tolls; as mentioned, AB 1467 specifically *prohibits* tolls on passenger vehicles. It also shows that there is no commitment from any private stakeholder, or even a serious expression of interest, and no serious business plan. It shows that there are no marketing studies. It shows that feasibility pre-development work has net even been started.

In short, if funding for these facilities is "reasonably available," then it strains the imagination to consider what *isn't* "reasonably available?" Until additional support for the toll strategies is provided, federal mandates require that new general purpose lanes in projects that rely heavily on new sources of toll revenue be removed from the constrained 2008 RTP.

Thank you for considering EHL's views. As always, EHL would be more than happy to discuss our position concerning the 2008 RTP with SCAG staff.

Very truly yours,

Michael D. Fitts
Staff Attorney