

<b>Letter ID</b>	<b>Agency</b>	<b>Author</b>
08-039	City of Fullerton	Heater R. S. Allen, Senior Planner
08-040	City of Garden Grove	-
08-041	Gateway Cities Council of Governments (GCCOG)	Richard R. Powers, Executive Director
08-042	Golden Rain Foundation -- Law Offices of Robert C. Hawkins	Robert C. Hawkins
08-043	GREEN LA	Stephanie Taylor, Work Group Coordinator
08-045	City of Huntington Beach	Ricky Ramos, Associate Planner
08-046	City of Huntington Beach	Ricky Ramos, Associate Planner
08-049	Imperial County	Jurg Heuberger, Planning and Development Services Director
08-050	City of Irvine	Sean Joyce, City Manager
08-051	John Wayne Airport	Alan L. Murphy, Airport Director
08-054	City of La Palma	John J. Di Mario, Community Development Director
08-055	City of Laguna Hills	L. Allan Songstad Jr., Mayor
08-056	City of Laguna Woods	Bert Hack, Mayor
08-057	Latino Urban Forum	-
08-060	City of Los Alamitos	David L. Rudat, Interim City Manager
08-061	Los Angeles County Bicycle Coalition	Kent Strumpell, Planning Committee Chair
08-062	County of Los Angeles -- Department of Public Works	Donald L. Wolfe, Director of Public Works
08-063	County of Los Angeles -- Department of Regional Planning	Bruce, W. McClendon, Director of Planning
08-067	City of Los Angeles -- Environmental Affairs Commission	Maria Armoudian
08-068	City of Los Angeles -- Department of Transportation	Rita L. Robinson, General Manager
08-069	Los Angeles to San Diego Rail Corridor Agency (LOSSAN)	Honorable Art Brown, LOSSAN Chair
08-070	Los Angeles County Metropolitan Transportation Authority (Metro)	Roger Snoble, Chief Executive Officer
08-071	Metro Gold Line Foothill Extension Construction Authority	Habib F. Balian, Chief Executive Officer
08-072	City of Mission Viejo	Dennis R. Wilberg, City Manager
08-073	National Association of Industrial and Office Properties (NAIOP)	James V. Camp, Legislative Action Committee Chair



February 19, 2008

Southern California Association of Governments (SCAG)  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

**Re: 2008 Regional Transportation Plan**

Thank you for the opportunity to review the 2008 Regional Transportation Plan (RTP). The City of Fullerton has reviewed the Draft RTP and has the following comments:

- (1) Page 55 states "Although the baseline growth forecast extrapolated the historical growth trends, 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."

The City of Fullerton respectfully requests that the Regional Council maintain the voluntary nature of the policy growth forecast as stated in the RTP document. To do so, the baseline forecast, not the policy growth forecast, must be adopted by the Regional Council as the official growth forecast for the 2008 RTP.

Adoption of the baseline forecast as the official growth forecast does not preclude SCAG from pursuing strategies to collaborate with local jurisdictions to influence growth patterns consistent with the policy growth forecast, as outlined on pages 89 – 91.

- (2) In comparing the baseline and policy growth forecasts for the City of Fullerton, growth is focused in two areas, the Downtown and the western City limits with Buena Park. The policy growth in both areas is problematic:

- a. Downtown – Although Downtown Fullerton is an area projected by the City to grow, based in large part on its proximity to the Fullerton Transportation Center, it is home to many of the City's original commercial and residential structures. The City's efforts to maintain these structures have preserved a unique collection of buildings contributing to the fabric of the Downtown. Future growth, therefore, will need to be undertaken in a manner that is compatible in intensity to this context.

The City's General Plan identifies development potential for the Downtown area. Based on the 1996 Plan and accounting for subsequent entitled growth, the General Plan considered growth of approximately 1,130 dwelling units in the area identified by the policy growth forecast for concentrated development. Assuming a 3% vacancy rate, this equates to 1,096 households. The baseline forecast includes 465 dwelling units (452 households). The policy growth forecast, however, has placed an additional 3,309 dwelling units (3,210 households) in

Downtown Fullerton in addition to baseline, for a total of 3,774 dwelling units (3,662 households). While some units above the baseline are supported by General Plan buildout, additional growth should not be assigned to the area without the necessary analysis and public input which are within the purview of the City of Fullerton.

Similarly for jobs, the baseline forecast identifies 1,472 new jobs while the policy growth forecast places 7,370 jobs over baseline in the Downtown. For a comparison to General Plan build out, jobs were converted to square footage based on the existing relationship of commercial and office square footage and occupancy requirements applied. Based on these estimates, baseline includes 54,464 square feet of new commercial and office space. The policy growth forecast adds another 272,690 square feet, for total growth of 327,154 square feet. Remaining development potential for this area is approximately 235,000 based on the 1996 General Plan. The additional growth above buildout should not be assigned to the area without the necessary analysis and public input which are within the purview of the City of Fullerton.

- b. West Fullerton – City and Town Residential developments are proposed at the western City limit with Buena Park to support the development of transit within that City. The area identified for growth within the City of Fullerton, however, is either on Fullerton Municipal Airport property or within its influence area. Within the influence area, land use restrictions exist which preclude certain new development. So long as the Fullerton Municipal Airport is in operation, the land uses and corresponding growth identified in the policy growth forecast are not possible.

Thank you again for the opportunity to provide input on the Draft 2008 Regional Transportation Plan.

Sincerely,



Heather R. S. Allen  
Senior Planner

CC: Mayor Sharon Quirk

*Garden Grove Comments on SCAG's Policy Forecast - Households 2035*

Census Tract	SCAG Policy Forecast Households 2035	Expected Households within Garden Grove Boundaries 2035	Difference between SCAG and GG	Comments
881.01	722	0	722	The portion of tract 881.01 in Garden Grove is entirely industrial, and we do not foresee any land use change to residential in the future.
881.07	1634	1733	-99	Tract 881.07, along Garden Grove Blvd., is likely to see more households than SCAG projects due to possible higher density residential and mix-use projects.
882.01	1514	1089	425	Tract 882.01 is a fully built out single-family residential area with some commercial use. Given the average size of lots, it is unlikely there will be room enough to accommodate second units enough to increase more than the OC 2006 Projections.
882.02	967	877	90	Tract 882.02 is a fully built out single-family residential area with some commercial use. Given the average size of lots, it is unlikely there will be room enough to accommodate second units enough to increase passed the OC 2006 Projections.
884.02	2464	967	1,497	Tract 884.02 is in a fully built out single-family residential area and includes the city's International West hotel and entertainment district. The tract also includes a school and open space. SCAG's growth in households in the tract is not expected.
885.02	1826	1587	239	Tract 885.02 is in a fully built out single-family residential area and includes the city's International West hotel and entertainment district. The tract also includes a school and open space. SCAG's growth in households in the tract is not expected.
886.01	1938	2049	-111	Tract 886.01 is projected to have more households than SCAG forecasts due to possible residential and mix-use projects in Garden Grove's civic center and Main Street areas.
886.02	1525	1666	-141	Tract 886.01 is projected to have more households than SCAG forecasts due to possible residential and mix-use projects in Garden Grove's civic center area.
887.01	1940	2039	-99	Tract 887.01 is projected to have more households than SCAG forecast calls for due to the possible development of the "Brookhurst Triangle" area, which is likely to include a mix of uses including condominiums, as well as residential development along Garden Grove Blvd..
887.02	1510	1645	-135	Tract 887.02 is projected to have more households than SCAG forecasts due to possible mix-use and residential development along Garden Grove Blvd. and Brookhurst St.
888.01	2597	2832	-235	Tract 888.01 is projected to have more households than SCAG forecasts due to possible mix-use projects with higher densities along Garden Grove Blvd.

Garden Grove Comments on SCAG's Policy Forecast - Households 2035

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884.02	2464	967	1,497	Tract 884.02 is in a fully built out single-family residential area and includes the city's International West hotel and entertainment district. The tract also includes a school and open space. SCAG's growth in households in the tract is not expected.
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# GATEWAY CITIES

COUNCIL OF GOVERNMENTS

February 15, 2008

Mr. Hasan Ikhata, Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

## **2008 Draft Regional Transportation Plan (RTP)**

The Gateway Cities Council of Governments (GCCOG) appreciates the opportunity to comment on the 2008 Regional Transportation Plan being prepared by the Southern California Association of Governments. The 2008 RTP process has been an open and inclusive process with many opportunities for participation by regional jurisdictions and the public.

GCCOG has the following specific comments and concerns about the RTP.

- The I-710 project between the San Pedro Bay Ports (SPBP) and State Route 60 does not appear to be clearly and consistently represented and included in the draft 2008 RTP. Most importantly, it is not always represented in a way that is consistent with the Locally Preferred Strategy adopted by the I-710 Oversight Policy Committee and the Los Angeles County MTA.

For example, the project is shown in Table 3.2 and on Exhibit 3.3 as a mixed flow highway project with a completion date of 2020. However, page 117 of the Draft RTP refers to “the first phase of a dedicated, toll clean technology truck lane system,” and page 118 and Exhibit 3.9 clearly describe “the I-710 as the first phase of a comprehensive system.”

The Supplemental Goods Movement Report (page 23) also identifies I-710 as a “specific corridor under consideration for” a dedicated clean technology truck lane, but it does not mention the possibility of tolling. SCAG staff have indicated that I-710 was modeled as a tolled truck lane. Yet Table 3.3, HOT Lanes and Toll Facilities, does not list the I-710 as a toll facility project. Since project alternatives are now under evaluation as

part of the I-710 EIS/EIR process, SCAG should consider modeling I-710 without as well as with tolls.

Similarly, the RTP project description for I-710 should note that there is a current effort to evaluate the feasibility of alternative technologies in the I-710 corridor, but that no decision on the use of that type of technology to move freight has been made as of the date of the RTP.

The RTP should also include the I-710 early action projects in the constrained plan (Shoemaker Bridge/Anaheim St and PCH interchanges, Firestone Blvd. interchange and Northbound Atlantic Blvd./Bandini Blvd. ramp/interchange). Los Angeles County RTIP project No. LAE3773 (page 7 of the Project Listing Report) refers to “reconstruct[ing] I-710 interchanges as part [of] I-710 corridor improvement program,” but does not identify which specific projects are programmed or planned for the identified funding of \$7.4 million.

There is an I-710 project, titled “freeway corridor improvements,” in the strategic plan, but the lead agency is shown as the City of Los Angeles, which is not the case for the I-710 project. It is unclear why this listing is included.

- We are concerned that the inclusion of a 9.2-million-TEU High Speed Rail Transport system for cargo in the RTP could adversely affect the evaluation of alternatives, including alternative cargo movement technologies, for the I-710 corridor EIR/EIS, by effectively prejudging the outcome of this critical local planning process. Our concerns are heightened because discussions preceding the City of Los Angeles’ vote to join the new Joint Powers Authority for the Initial Operating Segment referred to a cargo spur to the ports.

For example, Table 3.9 and the text on page 121 describe a system that would run from the ports to some inland facility in San Bernardino. The system would carry only freight from the ports north to a junction with the east-west initial operating segment of a combined passenger-freight high-speed system. The port segment is described as running “parallel to the I-710/Alameda Corridor.”

It is not clear how SCAG determined that the HSRT will handle 9.2 million TEUs, or how this capacity compares to the actual corridor need. Further, it is unclear whether the alternative technology scenario to be investigated in the I-710 EIR/EIS may (or may not) be part of a regional system. The RTP should be clarified to explain the status of the EIR/EIS and how alternative technology is being evaluated and what role it might play in the ultimate outcome for freight movement in that corridor. The COG is

supporting the “idea” of a freight movement corridor that would handle large volumes of freight, but it is very presumptuous to assume a container volume and technology at this time.

- A related point is that it is unclear where in San Bernardino an inland port facility for freight might be developed. Other areas (e.g., North Los Angeles County) are also vying to be a location for an inland port should the concept prove feasible.
- It is also unclear just what plan for high-speed regional transportation is included or recommended in the RTP. Appendix F of the Transportation Finance Supplemental Report includes one report on “HSRT/Alternative Technology Systems for Passenger and Freight” and another on “Orangeline High Speed Maglev.” It is not clear how these two systems or segments might coordinate or relate to each other when built. Also, the former report contains a section at the end on “Environmental Mitigation and Mobility Initiative,” but again it is unclear how this system might relate to the system described in the balance of the document or which system SCAG is envisioning for implementation in the RTP. Supplemental Report No. 9 (“High Speed Regional Transport System”) presents much of the same information as does the similarly titled report in Appendix F, but does not include any mention of the “Environmental Mitigation and Mobility Initiative.” Clarification of how these systems relate (if they do) should be included in the plan.
- SCAG developed a baseline population, housing, and employment growth forecast out to 2035 based on local input from cities and counties. However, SCAG has based the proposed draft 2008 RTP on a policy forecast that differs from the baseline in significant ways at the local (city) level as well as at the subregional and county levels. The policy growth forecast raises some questions about the underlying assumptions. For example, some older, built-out areas where SCAG predicts greatly increased residential density are unlikely to shift from industrial uses even as they may redevelop.

Unless SCAG can assure cities that having a planned or actual growth pattern different from that in the 2035 RTP forecast will have no undesirable consequences – for example, a reprioritization of transportation project funds – SCAG should use the cities’ own baseline forecast as the basis for the analysis in the 2008 plan recommended for adoption.

This is a major concern for Gateway Cities as the forecast being assumed by SCAG appears likely to result in higher density developments in Gateway Cities for areas that are already densely developed. This

decision by SCAG could “skew” the regional traffic model (2035 projections) and make those projections unreliable or inaccurate for Gateway Cities. We believe that the baseline forecast should be adopted as the official forecast for the RTP as it reflects local input and is the most likely and therefore the most accurate growth scenario.

- It appears that several freight rail grade separation projects of concern in the Gateway Cities subregion are omitted from the RTP and should be included in this long-range plan. (These comments assume that the LA County grade separation projects shown in Exhibit 3.11 are listed in numerical order as in the other county exhibits.) The requested projects are identified as follows:
  - Lakeland Road crossing (BNSF) – Santa Fe Springs
  - Pioneer Boulevard crossing (BNSF) – Santa Fe Springs
  - Rosemead Boulevard (UP) – Pico Rivera
  - Paramount Boulevard (UP) – Pico Rivera
  - Garfield Avenue (UP) – City of Commerce
  - Valley View/Stage Road (BNSF) – Santa Fe Springs and La Mirada
- On page 67 of the Draft RTP appears a statement that “More than 60 percent of the containers processed by the ports will involve a truck trip within the SCAG region.” The Multi-County Goods Movement Action Plan places this figure at close to 80%. This and other discrepancies between the RTP and the Multi-County Goods Movement Action Plan should be addressed and resolved.
- Table 2.6, Daily Truck Volumes by Corridor, omits two of the corridors most heavily used by trucks: I-605, and State Route 91. The 2002 and 2025 counts for these freeways should also be included and considered in SCAG’s analyses of regional and subregional goods movement impacts. Gateway’s recent study of the 91 and 605 freeways projects that in 2030, the 91 freeway will carry 41,800 trucks daily and I-605 will carry 38,050 (north of 91).
- The observation on page 120 that passenger train volumes are expected to experience growth similar to that in freight train volumes seems irrelevant to the freight discussion.
- In the Transit Operations section on page 96, SCAG proposes to work with transit operators to develop service delivery policies to optimize transit service. While we concur that frequent and efficient transit is desirable, there are such variations among transit services in the 6-county area that this has long been under the purview of the County Transportation Commissions, where it should remain. If SCAG wishes to

Mr. Hasan Ikhata, Executive Director

February 15, 2008

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conduct a study, it could provide its findings to the CTC's for consideration.

- In the same section, SCAG recommends analysis to recommend fare adjustments to maximize transit use, including fare-free concepts. While additional and stable sources of subsidies for transit operations are needed, it is important to note that Los Angeles' fares are among the lowest in the nation and many operators are considering increasing their fares as the only way to obtain additional operating revenues due to shortfalls at the state and federal level and possible losses of local sales tax revenues due to the economy. Rather than conduct a fare study, it may be more productive for SCAG to investigate other ways of increasing transit operating funds.

We look forward to seeing our comments and suggestions incorporated in 2008 Draft Regional Transportation Plan (RTP).

For questions or information concerning the content of this letter, please feel free to contact me at (562) 663-6850

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Powers', with a long horizontal flourish extending to the right.

Richard R. Powers  
Executive Director

# LAW OFFICES OF ROBERT C. HAWKINS

February 14, 2008

Via e-mail ([meaney@scag.ca.gov](mailto:meaney@scag.ca.gov)) and ([kirchner@scag.ca.gov](mailto:kirchner@scag.ca.gov))  
and Federal Express

The Hon. Gary Ovitt and Members of the Regional Council  
Southern California Association of Governments  
c/o Jessica Meaney and Jessica Kirchner  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, California 90017

Re: **The Southern California Association of Governments' ("SCAG") Draft 2008 Regional Transportation Plan (the "Project") and Draft 2008 RTP Program Environmental Impact Report ("DPEIR")**

Dear Hon. Mr. Ovitt and Members of the Regional Council:

Thank you for the opportunity to comment on the captioned documents for the Project. This firm represents the Golden Rain Foundation ("GRF"), a California non-profit corporation, which oversees the management and maintenance of the property, facilities and services within the senior community of Laguna Woods Village, formerly known as "Leisure World" in Laguna Woods, California. GRF manages property, facilities and infrastructure including roads and streets within the Laguna Woods Village and is in the process of perhaps developing additional lands provided for in the Laguna Woods General Plan.

On behalf of GRF and its community, we offer the following comments on the RTP and the DPEIR.

**I. The DPEIR Relies on a Flawed, Vague, and Incomplete Project Description.**

Chapter 2 of the DPEIR contains the Project description. The DPEIR states that the need for the Project arises from federal and state statutory requirements that the Regional Council must develop a regional transportation plan. The DPEIR states:

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“The 2008 RTP is a long-range regional transportation plan that provides a blueprint for future transportation improvements based on specific transportation goals, objectives, policies and strategies.”

DPEIR, 2-2. Table 2-2 identifies the goals of the RTP. These include: maximizing mobility and accessibility for all people and goods in the region; preserving and ensuring a sustainable regional transportation system; and encouraging “land use and growth patterns that complement our transportation investments.”

The DPEIR develops priorities and policies which balance these goals. For instance, the DPEIR states:

“The RTP must also integrate land use policies as a means to influence transportation performance and the economy. Without such integration, transportation needs in the future will significantly outpace the ability to pay for them.”

DPEIR, 2-6. Among the policies for the RTP, the Regional Council adopted:

“RTP land-use and growth strategies that differ from currently expected trends will require a collaborative implementation program that identifies required actions and policies by all affected agencies and subregions.”

DPEIR, 2-6. However, it is unclear how the DPEIR accomplishes this collaborative implementation. The primary method for collaborative implementation is the Regional Council’s

“...Compass Blueprint Growth Vision, **in addition to legislative efforts**, shapes the implementation program for enacting these policies and programs through partnerships with and services offered to cities, counties, subregions and county transportation commissions to ensure these positive effects on air quality.”

DPEIR, 2-11. This Compass Blueprint program is “... one of the first large-scale regional growth visioning efforts in the nation. ...” It seeks:

“... to integrate land use and transportation with the goal of accommodating approximately 5.14 million additional residents between 2008 and 2035, while improving mobility for all residents, fostering livability in all communities, enabling prosperity for all people, and promoting sustainability for future generations.”

DPEIR, 2-11.

Unfortunately, as discussed more fully below, this regional land use program conflicts with state law and local land use plans. As indicated above, part of this program may have to include

legislative action to allow for a regional transportation plan which seeks to influence local land use plans; under current law, the regional plans have no ability to influence local land use plans. Interestingly, relying on legislative changes is speculative: changes to the State Planning Law or other changes depend upon the political process which at best is unpredictable.

Moreover, the Regional Council is a joint powers authority formed under the Joint Exercise of Powers Act, Government Code section 6500 et seq. Although as a joint powers agency, the Regional Council may have the authority to exercise powers of its members jointly, nothing in the Act allows the joint powers agency to exercise powers especially land use powers over one of its members which powers are exclusively reserved for that member. Hence, the Regional Council has no land use authority or powers within the jurisdiction of local governments including the City of Laguna Woods or the County of Orange.

Moreover, such regional plans should not directly or indirectly influence local land use plans. See Government Code section 65080.3. To the extent that the Regional Council seeks to have such influence, it must be based on regional efforts to educate local government, not by transportation mandates and sanctions.

Indeed, the Project for the RTP really appears to be a regional land use planning project. The DPEIR states:

“SCAG prepared two growth forecasts in preparation of the 2008 RTP, a ‘baseline’ growth forecast that does not include land use strategies and a ‘policy growth alternative’ (used in the Plan). The comparison of the transportation modeling results between the ‘baseline growth alternative’ and the ‘policy growth forecast’ isolates the transportation benefits due to regional land use policy.”

DPEIR, 2-11-12. However, this methodology ignores the local impacts—both land use and transportation— due to this regional policy benefit.

Moreover, the benefit is only incremental: technological changes likely will account for greater savings than this controversial regional planning effort. Further, any incremental benefit from regional planning will be drastically lessened by the conflicts between the regional plan and local plans and between regional transportation plans and local transportation plans. Indeed, the regional planning effort may leave crucial local planning policies and transportation needs without the necessary funding. Without this funding, local transportation needs and problems will be exacerbated.

More importantly, the Project description is too vague, too ambiguous, and lacks specifics. The RTP is a regional transportation plan but it lacks specifics as to what transportation projects are planned. That is, it contains:

**“transportation/urban form strategies** that encourage compact growth, increased jobs/housing balance, and centers based development where feasible, in all parts of the region.”

DPEIR, 2-22. This is far from the regional transportation plan required by state and federal law. The RTP and the DPEIR should be revised to explain how the Regional Council has the authority to develop and adopt this regional “urban form strategies” under current law. Further, the RTP and the DPEIR should be revised to assess and consider the impacts of this “transportation/urban form strategy” on local land and transportation needs, decisions and projects.

This “transportation/urban form strategies” requirement is troubling for another reason: funding of local transportation projects.

“Transportation projects in the SCAG region must be consistent with the RTP in order to receive federal funding. The 2008 RTP includes a policy element with goals, policies, and performance indicators, an action element that identifies projects, programs and implementation. In addition, the RTP includes a description of regional growth trends to help identify future needs for travel and goods movement.”

DPEIR, 2-4. However, given that the RTP may conflict with local land use plans, this may create further economic impacts for the Project which impacts must be analyzed under the National Environmental Policy Act, 42 U.S.C. sections 4321 et seq.

Indeed, we understand that part of this transportation/urban form strategies may include reassigning housing units to other areas despite local general plans and their requirements. This conflict must be explained in the RTP and analyzed in the DPEIR. If this impact to local plans is correct, it must be mitigated. As discussed below, the Regional Council has many avenues for such mitigation.

**II. The DPEIR Relies on a Flawed Methodology and Mistaken Assumptions on Land Use which Lead the DPEIR to Erroneous Conclusions.**

As you know, the original Notice of Preparation for the DPEIR indicated that the DPEIR would address both the RTP and the Regional Comprehensive Plan. The Regional Council received loads of comments critical of this methodology and urging the Regional Council to separate the projects. The DPEIR indicates that the Regional Council agreed and rescoped the Project for the DPEIR to include only the RTP. DPEIR, 1-5.

Unfortunately, the DPEIR does not really separate the two projects. The land use assumptions in the RCP based on the Compass Blueprint Program form the basis of most of the analysis in the DPEIR including its land use and transportation analyses. These incorrect assumptions infect the entire environmental analysis in the DPEIR. Indeed, as indicated above, the

unnumbered section of the Project Description, Chapter Two, entitled "The Intended Uses of PEIR" (sic) fails to identify that one of the intended uses is for reference to the draft environmental impact report for the RCP. Given that the Regional Council originally intended to treat both in the same document, it is likely that the two documents, if there are two, would reference each other. Obviously, the DPEIR includes the RCP.

For instance, Section 3.8 attempts to analyze land use issues for the Project. This section identifies two project-related impacts and one cumulative impact which, after mitigation, remain unavoidable and significant:

1. **Impact 3.8-1:** "The proposed 2008 RTP contains transportation projects and strategies to distribute the future growth in the region. These projects and strategies could result in inconsistencies with currently applicable adopted local land use plans and policies in the RTP including **the potential to conflict with local general plans.**" (DPEIR, 3.8-10)
2. **Impact 3.8-2:** "The 2008 RTP contains transportation projects that have the potential to disrupt or divide established communities." (DPEIR, 3.8-13)
3. **Cumulative Impact 3.8-3:** "Urbanization in the SCAG region will increase substantially by 2035. **The 2008 RTP, by increasing mobility and including land-use-transportation measures, influences the pattern of this urbanization.** The 2008 RTP's influence on growth contributes to regional cumulatively considerable impacts to land use and would change the intensity of land use in some areas." (DPEIR 3.8-15)

As indicated above, the DPEIR concludes that, after all mitigation measures considered in the DPEIR, these impacts remain significant and unavoidable. As indicated above, the DPEIR fails to consider all necessary and appropriate mitigation measures to lessen the RTP's land use impacts. MM-LU.1 through .7 fail to consider and appreciate fully local land use plans. MM-LU.1 encourages local agencies to provide electronic versions of their general plans and updates. MM-LU.2 provides that the Regional Council shall encourage, through regional comments, local agencies to update their general plans every ten years. MM-LU.3 provides that the Regional Council shall work with local agencies "to ensure that transportation projects and growth are consistent with the RTP and general plans." (It fails to note or appreciate that the RTP may conflict with local general plans.)

Interestingly, MM-LU.4 provides:

"Planning is an iterative process and SCAG is a consensus building organization. SCAG shall work with cities and counties to encourage that general plans reflect RTP policies. SCAG will work to build consensus on how to address inconsistencies between general plans and RTP policies."

DPEIR, 3.8-11. This mitigation measure fails to understand that one way to eliminate RTP inconsistency is to make the RTP more closely mirror local plans.

MM-LU.5 and .6 require that the Regional Council work closely with local agencies so that local general plans will comply with the requirements of the Regional Comprehensive Plan and the Compass Blueprint. That is, the Regional Plan for growth will change the local land use plans. The Regional Council cannot require either directly or indirectly such compliance. More pointedly, the Regional Council cannot use financial means, e.g. failing to fund crucial transportation projects required by local land use plans, as a way of gaining compliance of local plans with the Regional Plan.

Clearly, other and better mitigation measures are available which will address fully the RTP's land use impacts. For instance, instead of requiring local compliance, the RTP could be revised to include consultation with local agencies and funding of important local transportation plans. Or working with local agencies to include compliance with various aspects of the RTP in exchange for funding local plans for infrastructure which may be out of synch with the RTP. For instance, Laguna Woods Village and the City of Laguna Woods make extensive use of alternative means of transportation, e.g. bike lanes and electric vehicles. The RTP should be revised to value these alternative methods and fund other projects which may not be contemplated by the RTP, e.g. expansion of congested roadways such as Moulton Parkway and/or El Toro Road.

Further, as indicated above, these conclusions are fatally incorrect for several reasons. First, the Regional Council does not have the authority to override local land use plans and policies including local general plans. Indeed, Government Code section 65080.3(g) provides:

“Nothing in this section grants transportation planning agencies any direct or indirect authority over local land use decisions.”

Although section 65080.3 applies to alternatives, if the alternatives truly are alternatives to the proposed plan, the plan must be bound by the same restrictions: No authority to override, either directly or indirectly, local land use decisions, e.g. general plans.

Moreover, the State Planning and Zoning Law provides almost plenary authority to local agencies over local land use matters. For instance, Government Code section 65800 provides, in pertinent part that except for areas not applicable here:

“[T]he Legislature declares that in enacting this chapter it is its intention to provide only a minimum of limitation in order that counties and cities may exercise the maximum degree of control over local zoning matters.”

Second, the only basis for the assumptions in the land use analysis lies in the RCP which is based upon the Compass Blueprint Program. However, the DPEIR states that it does not rely on the

RCP. Because the RCP underlies the DPEIR's analysis, the DPEIR is internally inconsistent. It must be revised to explain and clarify its land use assumptions which are not part of the RCP.

Third, none of these impacts are unavoidable. If the RTP is consistent with local land use plans, then it would not have these impacts. Further, even if not consistent, if the Regional Council were to assist, cooperate and work with all member local agencies to develop local general plans and the RTP which are consistent in the main, then the Project would avoid these impacts.

Fourth, although these impacts of the Project are significant, if the Regional Council worked with local agencies to understand and appreciate local general plans, it could modify the RTP so that it more closely conformed to local general plans. Indeed, even if the RTP did not closely conform with local land use plans, this cooperation would bring the local agencies more perfectly into the process.

Fifth, as indicated above, the Project cannot directly or indirectly alter local land use policies and decisions. Because the Project conflicts with local plans, it encroaches illegally into the authority of local agencies.

Sixth, the DPEIR uses an improper baseline for the RTP. The DPEIR fails to consider existing facilities and land use, and improperly relies on approved general plans as the baseline. This is improper. The appropriate baseline is the existing condition. As the Court of Appeal recently observed:

“Before the impacts of a project can be assessed and mitigation measures considered, an EIR must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined.”

County of Amador v. El Dorado County Water Agency (1999) 76 Cal.App.4th 931, 952; CEQA Guidelines sections 15125(a); 15126.2(a).

Incidentally, the Guidelines require that environmental documents such as the DPEIR analyze the Project's impacts on land use for “any applicable habitat conservation plan or natural community conservation plan.” The Guidelines regards such impacts as land use impacts and yet the DPEIR contains no discussion of such impacts.

For all of these reasons and others, the Regional Council should revise the RTP to appreciate local land use plans, revise the DPEIR to fully consider and analyze the Project impacts on land use, and revise the DPEIR and the RTP as indicated above.

**III. Conclusion: The Regional Council Must Revise the RTP and the DPEIR, and Recirculate these Documents for Further Review.**

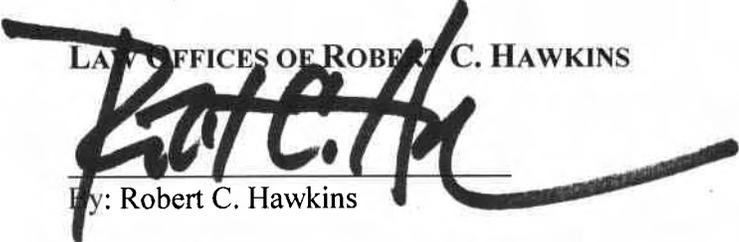
As indicated throughout, the RTP and the DPEIR lack important specific details necessary to understand and comment on the Project, fail to provide adequate explanation and discussion of crucial issues including its conflicts with local land use plans, fail to discuss and explain the Regional Council's authority to craft its own "transportation/urban form strategies," and fail to provide adequate mitigation. For these reasons and others, the RTP and the DPEIR must be revised and recirculated.

Again, thank you for the opportunity to comment on the DPEIR for the RTP. We look forward to participating in the public hearing process, receiving responses to these and other comments, and commenting on those responses at the appropriate public hearings. Please include us on all mailing lists for notices of further environmental documents for the Project and/or for the RCP as well as any and all hearings on these project.

Of course, should you have any questions, please do not hesitate to contact us.

Sincerely,

LAW OFFICES OF ROBERT C. HAWKINS

  
By: Robert C. Hawkins

RCH/kw

February 13, 2008

Southern CA Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

RE: Comments on the Regional Transportation Plan (RTP)

To Whom It May Concern:

We would like to offer comments and observations on the RTP. These comments are in part a response to a presentation on the RTP by SCAG staff on 2/12/08.

Stephanie Taylor works for GREEN LA, a network of environmental organizations, that convenes a work group/coalition focused on transportation policy. The transportation work group's membership is diverse and includes most of the organizations working on transportation and transit issues in Los Angeles.

#### Transportation Priorities

The GREEN LA transportation work group's goal is to move the City of Los Angeles towards eliminating auto dependency and making Los Angeles transit-pedestrian-and bicycle-friendly. Our current policy priorities are to: 1) use parking policy to reduce car dependency, 2) increase bus-only lanes, and 3) advocate for the creation of a pedestrian master plan.

We are also working to increase the City's understanding and use of the complete streets model and believe complete streets is an important strategy to increase transportation access and choice. Complete streets are more than just conduits of travel. They are great places designed for everyone, including a number of modes and methods to get around. Beyond just creating space for us when we're driving, complete streets provide and prioritize viable transportation choices for people walking, biking, and taking public transit—transportation choices that are better for our health and better for the environment.

Furthermore, because Los Angeles has provided cars more than their fair share of street space, we believe that every street project done in Los Angeles should prioritize, support, and enhance walking, biking, and public transportation to create complete streets – streets that also include a full canopy of trees for both the environmental benefits and for the comfort of pedestrians.

#### RTP Presentation - Environmental Justice (EJ) Analysis

It would be more meaningful to residents if the EJ charts by quintile were also broken down by county and by the region. The aggregated data is not convincing. We are concerned about data for the county in which we live and work.

The transportation investments chart would be helpful by transportation mode, particularly for an EJ analysis. For example, if low income people depend on transit, it would be good to know the percentage of the budget that is spent on transit.

The data on the impact on air quality would especially benefit from mapping. Any data that could be mapped to show how investments/impacts specifically relate to communities disproportionately impacted by air pollution, such as near the ports, LAX, near 710 freeway would be very illuminating and much more useful.

### Public Participation

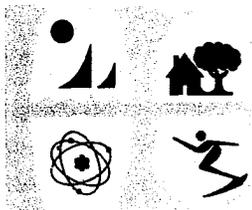
The staff has expressed their willingness to give presentations to groups and they seem to genuinely want to engage people, however, from what I observed from last night's meeting, there is much SCAG can do to improve engagement. I offer the following observations to improve the public's ability to meaningfully provide feedback on the RTP. First, the plan needs to be explained. It is difficult to know what sort of feedback is useful. It would be helpful to know, for example, the sort of feedback that SCAG can act on, such as policy, vision, priorities, etc. and what SCAG can not act on, for example, what projects are included in the RTP. Asking the public to comment on the plan without any further information is overwhelming. Secondly, we need to know why our input is important, what it will be used for, and how it impacts the report. Lastly, partnering with non-profits and advocacy groups will result in increasing the participation of the general public. For example, co-sponsoring meetings, and conducting a training on the RTP for staff (and residents) in advance of a presentation would be helpful.

The online survey seems to indicate that SCAG is interested in knowing people's resource allocation priorities and transportation modes. Having the online survey in hard copy available to people who attend a presentation would be helpful. Also, tell us how the survey information will be used.

Sincerely,

Stephanie Taylor  
Work Group Coordinator  
GREEN LA  
2121 Cloverfield Blvd, #113  
Santa Monica, CA 90404  
(310) 453-3611

Stephen & Enci Box  
illuminateLA  
GREEN LA Work Group



# City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

## DEPARTMENT OF PLANNING

Phone 536-5271  
Fax 374-1540

December 21, 2007

Dr. Frank Wen  
SCAG  
818 W. Seventh St., 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Subject: Draft 2008 SCAG Policy Forecast**

Dear Dr. Wen:

Thank you for the opportunity to review the Draft 2008 SCAG Policy Forecast. In the table below we identify census tracts located in the City of Huntington Beach where we believe the SCAG Policy Forecast for additional household and/or employment growth beyond what is identified in the 2006 Orange County Projections is too high and therefore unlikely to occur:

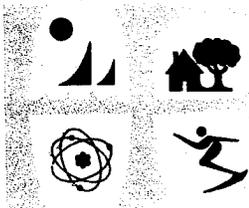
Household Growth (Census Tracts)	Employment Growth (Census Tracts)
992.20	992.20
992.42	993.07
993.05	994.02
993.07	994.11
994.02	994.13
994.11	
994.13	

In addition to being built out, some of these areas have additional constraints such as wetlands. We do not foresee these census tracts experiencing the additional growth projected by SCAG. Feel free to call me at (714) 536-5624 if you have any questions.

Sincerely,

  
Ricky Ramos  
Associate Planner

c: Mary Beth Broeren, Principal Planner  
Pat Dapkus, Senior Administrative Analyst



# City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

## DEPARTMENT OF PLANNING

Phone 536-5271  
Fax 374-1540

January 17, 2008

Dr. Frank Wen  
SCAG  
818 W. Seventh St., 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Subject: Draft 2008 SCAG Policy Forecast**

Dear Dr. Wen:

Last month the City of Huntington Beach provided comments on the Draft 2008 SCAG Policy Forecast. In our letter we identified census tracts located in the City of Huntington Beach where we believe the SCAG Policy Forecast for additional household and/or employment growth beyond what is identified in the 2006 Orange County Projections is too high and therefore unlikely to occur. As requested, we are now providing specific reasons for our prior comments below:

Census Tract	Growth Type	Basis For City of Huntington Beach Comment
992.20	Both	Only vacant land left is either wetlands or landfill anticipated to be developed for open space use only.
992.42	Household	Only vacant land left is designated in General Plan for commercial use.
993.05	Household	Only vacant land left is designated in General Plan for commercial use.
993.07	Both	Area has recently redeveloped and not likely to change anytime soon. Also, no vacant land left.
994.02	Both	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.  SCAG forecast is for additional 483 households and 1,002 jobs.
994.11	Both	No vacant land left.
994.13	Both	Area has recently redeveloped as part of a master plan and not likely to change anytime soon. Maximum build out of vacant land left pursuant to General Plan designation will result in the addition of maximum 62 dwelling units, 17,200 s.f. of commercial building, and 130,000 s.f. of industrial building.  SCAG forecast is for additional 1,039 households and 2,360 jobs.

The SCAG Policy Forecast projects an additional 2,843 households combined for all the census tracts identified above. We believe that no more than half of this (1,400 households) can be accommodated elsewhere, specifically within census tracts 997.03 and 996.05. If SCAG were interested in keeping the balance of the household growth, we would recommend channeling it along the Beach Boulevard corridor. Feel free to call me at (714) 536-5624 if you have any questions.

Sincerely,



Ricky Ramos  
Associate Planner

c: Mary Beth Broeren, Principal Planner  
Pat Dapkus, Senior Administrative Analyst  
Tracy Sato, City of Anaheim  
Chuck Wilson, City of Mission Viejo



IMPERIAL COUNTY

## PLANNING & DEVELOPMENT SERVICES

PLANNING / BUILDING INSPECTION / ECONOMIC DEVELOPMENT / PLANNING COMMISSION / A.L.U.C.

**JURG HEUBERGER AICP, CEP, CBO**  
PLANNING & DEVELOPMENT SERVICES DIRECTOR

February 19, 2008

Attention: Jessica Meaney,  
Shawn Kuk  
Regional Planner  
So. Calif. Ass'n of Governments  
818 West Seventh St., 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

**Subject: Response to SCAG Regional Transportation Plan (RTP)**

Dear Ms. Meanly and Mr. Kuk:

The County Planning & Development Services Department received a copy of the proposed Southern California Association of Governments (SCAG), 2008 Regional Transportation Plan (RTP) for review and comment. As a member of SCAG for many years, the County of Imperial continues to support the many programs and financial needs that are expressed within the RTP for connecting the region's ports, airports, and urban activity centers.

However, the Department found the RTP significantly lacking in several areas when it came to Imperial County. We understand that when it comes to SCAG's six (6) Counties, Imperial County does not "rank" in terms of population, traffic, employment, and revenue generation, but this document fails to adequately plan for Imperial County. In some cases Imperial County is only briefly discussed, with minimal analysis, while in other cases Imperial County is simply not brought up. It does not appear that SCAG did a comprehensive assessment of Imperial County.

If this document is designed to truly be a "regional" plan for the various forms of transportation from 2008 through the year 2035, than a more thorough review of Imperial County, its roads, rails, aviation, air quality, economic make up, land use, and published documents is gravely needed. We particularly ask that the County's "50" year Circulation Element be considered. It is our understanding (perhaps misunderstanding) that SCAG in preparing the RTP does not fully review General Plans of a County/City or at least not in detail. We think (if true) that this is necessary!

SCAG does a great job in the RTP in explaining the regional goals and objectives for Southern California; it is only when it comes to detail analysis that it is weak as it pertains to Imperial County. The following are the Department's concerns presented on behalf of the County.

- 1) The RTP is unclear regarding air quality emissions, Chapter II, Transportation Planning Challenges, page 70, what SCAG's plan is for appropriate air quality mitigation within the SSAB and possible future exceedances of the National Ambient Air Quality Standards (NAAQS) under the Clean Air Act due to increased train trips through the County. It does not seem that with double tracking the UPRR vastly increased train traffic in adequately considered.

The RTP states that "...Of additional concern are the upcoming 24-hour PM2.5 standards, which will require even greater reductions as well as possibly more stringent ozone standards. Consequently, the ARB, SCAQMD, and SCAG are committed to producing a white paper that identifies strategies to address the shortfall issues..."

Since Imperial County is "downwind" of the SCAQMD area and its pollutant "carrying capacity", it is important to control mobile (all) air emissions from the SCAG region that affects Imperial County residents. Any mitigation measures to improve the air quality in the SCAQMD region will also improve the SSAB's air quality as well.

However, the "Mitigating Environmental Impacts" and "Summary of the Environmental Mitigation Program" commencing on page 127, and discussed on page 132, does not provide for any future SSAB mitigation measures for the downwind emissions from the SCAG region and addresses only the SCAQMD area.

This is also mentioned in the "Performance Measures Report", pages 17 and 18, stating that "...SCAG uses the environmental justice analysis to help its elected officials make transportation planning decisions fairly. The analyses are designed to assure that benefits and burdens are not distributed unfairly across populations in the region...the recommendation is to work with the South Coast Air Quality Management District (SCAQMD) to include their Urban Airshed Model (UAM) in the environmental (UAM) in the environmental justice analysis..."

Another discussion is in the "High-Speed Regional Transport Report, page 17, in entitled "Environmental Considerations/Health Impacts from Goods Movement Sources", that states "...Significant adverse community health and safety impacts are linked to air pollution from Southern California goods movement system. A recent CARB assessment of PM2.5 health effects shows a disproportionate exposure in the South Coast Air Basin relative to other parts of the state and to the rest of the nation...The goods movement system, along with construction equipment, is a primary source of PM2.5 emissions...full environmental feasibility studies will be needed to be performed..."

- 2) The RTP and FEIR need to address the increased air quality impacts that will impact local minority and low-income residents along this rail corridor by the increased number of trains. Also, the air quality section of the PEIR should address the "inter-district transfer" of air pollutants from Riverside and San Bernardino into and through Imperial County. The Salton Sea Air Basin (SSAB) will be increasingly impacted and the Imperial County Air Pollution Control District will need to reflect this new source of air pollution in its future air quality planning efforts.
- 3) The RTP identifies 131 proposed grade separation rail road crossings, none of which are located in the Imperial County. As the RTP states Union Pacific will be double tracking its rail line from the Alhambra to Yuma. The County Planning and Development Services staff has recently met with representatives of the Union Pacific Railroad regarding the "double-tracking" of the existing railroad tracks from Indio to Yuma, Arizona. When this "double-tracking" is completed, the number of trains through Imperial County will increase from approximately 46 trains per day to over 92 trains per day according to the Union Pacific representatives. Union Pacific also has a rail line from Calexico/Mexico to Niland where it connects to the Alhambra to Yuma line. The RTP needs to be revised to look at potential grade separation rail road crossings throughout the developed areas of Imperial County. Several intersections in the County, according to U.P & CPUC need grade separated configurations, such as; McCabe & Dannenberg Road, Highway 111 & Hot Mineral Spa Road; possibly Highway 78 at Glamis, etc.
- 4) The inter-County rail line from San Diego County to Imperial County, San Diego & Arizona Railroad, has been proposed to re-open for commercial operations. This would include the movement of goods, aggregate, sand and gravel materials into the Counties of Imperial and San Diego. The re-opening of this important link between San Diego County and Imperial County was not identified in the RTP. Please revise the RTP to include the re-opened rail line for both rail network and for possible future funding and for regional information to stakeholders. This re-opened rail line can assist in increasing NAFTA imports and exports to and from Mexicali, Mexico, into the Southern California region.
- 5) The RTP has no mention of Imperial County's regional transit system. There is a countywide bus based transit system. Providing commuters access to the major cities in the county as well as shuttles to San Diego and Yuma. The information is provided in the County's General Plan, Circulation/Scenic Highways Element, and it needs to be addressed in your RTP. We ask this only because we don't know if IVAG has responded to this posed the questioned.

- 6) The County has recently revised the General Plan, Circulation/Scenic Highways Element, on October 17, 2006. The Element has a fifty year build-out with identified road classifications, and right of way. The RTP fails to identify Imperial County arterials or even references the County's General Plan. It is imperative that SCAG assist Imperial County in its continuing efforts to reduce congestion in local cities, to promote local transportation planning and ensure that future financing for transportation projects is provided in an effective and efficient manner. (see also paragraph 3, page 1)
- 7) As SCAG is aware, there is a continuing transportation issue as it relates to the "Brawley Bypass" and the funding of future development projects within Imperial County for alleviating congestion and promoting better regional/transportation strategies. The existing and proposed residential, commercial and industrial projects that have been submitted and discussed to both the County and the seven Cities will have a tremendous impact on future traffic planning by CALTRANS, the seven Cities and the County.

The "Brawley Bypass" is mentioned last in the "Project Listing Report", pages 193- 194, under the title, "Strategic Plan Projects" and states "...The following is an illustrative list of additional investments that the region would pursue if **additional funding were to become available**, and after further consensus building is undertaken to solidify commitment around specific project scopes and strategies. These projects are not part of the financially constrained RTP..." (emphasis added).

The "Highways and Arterials Report", page 13, entitled the "The Baseline 2035 System/System Description" identifies the "Brawley Bypass" and states that "...SCAG has assessed the future transportation system performance under the assumption that the Baseline projects committed in the Regional Transportation Improvement Program (RTIP) will be completed. Examples of major Baseline projects include: "The Brawley Bypass in Imperial County" as the first bulleted item. It is important for the RTIP addresses funding as a priority for completing the "Brawley Bypass" as a very important NAFTA link, United States from/to Mexico, and the future movement of goods into the Southern California region via State Routes 111 and 86.

- 8) The long-range vision that SCAG has for Imperial County is discussed in very general terms in the RTP but does not focus on critical transportation needs of the County. It is critical that SCAG assist the County in its continuing efforts to reduce congestion on the two Mexican border crossings, local County and City roads/streets/intersections, promote transportation planning and ensure that future financing for transportation submitted projects is provided in an effective and efficient manner. If there is information that SCAG needs from the County or IVAG please let us know.

As discussed in the "Goods Movement Report", page 5, "Cross-Border Trade Activity", it states that "...The Calexico POE was the second busiest land crossing along the California/Baja California border with approximately 17 million people crossing northbound in 2003 and 600,000 annual truck crossings...Caltrans estimates that border trade activities will continue to grow, with approximately 5.6 million border crossings expected by 2030...a Union Pacific (noted earlier above) rail line connects Mexicali in Baja California to Calexico and El Centro in Imperial County. This line handles approximately 160 railcars per day, six days a week..."

- 9) The Imperial County Airport has recently been designated as an "International Airport" not a commuter airport as noted in the RTP and the Aviation report/appendix. Imperial County spend a considerable amount of time and funds developing a comprehensive study for a "Regional Cargo/Panssanger Airport" being sited in Imperial County along with a High-Speed Rail service from San Diego to Phoenix, very similar to SCAG's proposed HSRT system. The Study recommended that the County's existing Imperial County Airport be relocated and incorporated into the Regional Cargo Airport.

The RTP hences the majority of its hopes into one senerio, that of the taking the realtivley small Palmdale airport and making the regional airport for the Los Anageles basin, and develop the HSRT system to support it. It is hereby requested that the Imperial County Regional Cargo Airport Study supplied to SCAG last year be incorpoerated into the RTP and that the RTP along with the Aviation report/appendix be amended to reflect Imperial County's goals and objectives for a regional cargo airport.

- 10) The "Aviation and Airport Ground Access Report", page 4, entitled "Military Air Base and Air Cargo Planning in the 1990s", discusses military air bases and air cargo planning efforts. There is no discussion on Imperial County's Naval Air Facility, El Centro nor could the Department find it identified on any of the maps in the RTP. The local Naval Air Facility, El Centro, is not one of the proposed military base closures. The Facility is in fact currently updating its "Air Installation Compatibility Use Zone (AICUZ)" plan and there are plans to increase the number of aircraft utilizing the air base in the future. The SCAG aviation planners should contact the Commanding Officer, at (760) 339-2524, to obtain further information on future air operations planned at the air base for inclusion in the above Report. The County of Imperial has had a strong relationship with the Navy and has through land use regulations made every possible attempt to maintain an appropriate buffer around the Naval Air Facility, El Centro, and will continue to do so for the perceivable future. NOTE: this may not be an issue, as we understand the RTP only addresses bases scheduled for closure. We have included the comment only to reflect that while NAF is not scheduled for closure and happed not to be scheduled. However its location significantly affected the location of the proposed regional airport, due in part to air space issues and restrictions.

- 11) The non-motorized transportation portion of the RTP and its report/appendix identify Imperial County as being having a Bicycle Master Plan, however there are three errors regarding the County's Plan. First the Table 5 on page 15 denotes that Imperial County has no Class 1, class 2, or Class 3 bicycle routes that is worry. Please refer to the 2007 Imperial County Bicycle Master Plan submitted to SCAG last year for details on Bicycle routes. There is an error in Table 5 (different table 5) on page 11 of the non-motorized transportation report which shows that Imperial County's Bicycle Master Plan started in 2003 and was updated in 2007, while in the preceding text it correctly identifies the 1999 date as to the first approved plan. Additionally, Imperial County is the only county that does not have a graphic exhibit (map) denoting its bicycle facilities. Please revise the non-motorized transportation report correcting these three errors.
  
- 12) As it pertains to growth in the region the RTP is weighted heavily on the western "Urban" cores as denoted on pages 32, 33, 47, 87 through 91, and in various reports/appendixes. According to the RTP Imperial County is a "Growing Periphery" which is the direct opposite of the urban cores to west where developable land is all but nonexistent. Imperial County has enormous land reserves for residential and industrial development. The RTP needs be revised to reflect the potential growth of Imperial County, eastern Riverside County, and San Bernardino County. The RTP needs to look more at development of new cores with a strong emphasis on jobs housing balance, using some of the numerous techniques identified for the western urban areas to create centralized area, and to help us not repeat the western urban cores mistakes of the past. There is a opportunity to create satellites urban areas in SCAG's region that will not have an adverse affect on the regional traffic system, that will minimize sprawl by centralizing the jobs to these eastern cores, thus reducing the need to commute to the western urban cores.

Imperial County has over 6,500 acres of industrial land ready for development in the Mesquite Lake Specific Plan and the Gateway of the Americas Specific Plan Areas. These two industrial areas can handle all levels of industrial uses from light to heavy. The County's proximity to the United States Mexico border coupled with NAFTA, lends itself to become a major industrial job center.

The County of Imperial and its seven cities have in the planning process over 30,000 dwelling units in various stages of development. The County has a development map and listing of projects that is continually being updated and other City/County projects are added in the future as they are submitted. For further information on these projects, please contact my office and/or the applicable City planning staff in Brawley, Imperial, El Centro, and Calexico.

- 13) In the "Environmental Justice Report", page 21, it states that "...It is critical for SCAG and policy-makers alike to ensure that their transportation programs, policies, and activities serve all segments of the region without generating disproportionately high and adverse effects...Accommodating the anticipated growth in the SCAG region in a sustainable way – by taking account of

ecological, economic and social justice factors, while enhancing quality-of-life for present and future generations – represents the central challenge facing regional transportation planning in Southern California..."

- 14) The Green House Gas emissions issues are only briefly discussed on page 72 and again in the air quality appendix. It is anticipated that a more comprehensive analysis fitting the intent of AB32 will be prepared for the Environmental Impact Report. If not the Department fears that the State Attorney General will take issue with the RTP, which is by far the single biggest emissions plan proposed since the adoption of AB32.
- 15) The regional maps used throughout the RTP and the reports/appendixes for example pages 57 through 61 are very difficult to read. The maps are 8x10 and have a small box in the upper left corner denoting Imperial County. Because of the scale used the data superimposed on these base maps are all but impossible to view. The graphic depiction of data is only as good as what the average reader can view, read and extrapolate data from. It also near impossible to read the legends. redo all maps that are intended to depict Imperial County to a scale that can be viewed by the naked eye and not require a magnifying glass.
- 16) The Department has a fundamental question on the process (and ultimate value) of the RTP. While we are aware of the state and federal mandates which underlie the Plan, the process appears faulty. How can the RTP be a long term document when it is completely revised every four years? A four year (major) revision cycle seems less than "visionary." How does SCAG do a true analysis on a plan that within only one year of adoption establishes the first step for its own revision (as identified on page 39), as being to "...review and update...the basic assumptions in the existing RTP, including the goals and objectives..."? In essence, the existing RTP is newly adopted and yet is already being scrutinized with barely any track record. Traffic analysis, we would all agree, is a long term proposition involving dynamic variables including changes in traffic patterns, development of infrastructure, and air quality assessments, etc. These all take time to establish...and time to evaluate. A related issue involves the Regional Traffic Improvement Plan (RTIP). If the RTIP is intended to represent the first six years of the RTP (as denoted on page 42), but the RTP is only valid for four years before getting revised, then the RTIP can never truly meet its mandate. It is our opinion, therefore, that the RTP is not so much a long term plan as much as it is a current plan with aspirations of a twenty plus year forecast. Perhaps we don't fully understand the process and it has been suggested that this is more a question for the Federal than SCAG. Nevertheless there seems to be some inconsistency?
- 17) The demographic data identified on page 47 and used throughout the document relies heavily on the State of California Department of Finance which, in turn, uses the 2000 federal census as its base data stream and generates new estimates every January, based, in part, on extrapolating births minus deaths. Our concern is that as the data stream gets further away from its original source,

in this case the 2000 census, it tends to become more and more skewed as it pertains to the key variables of population, households, ethnicity, socioeconomic status, etc. With the 2010 census only a few more years away, it is highly conceivable that the demographic base utilized in the RTP could be "out of sync" with the newly released federal census data midway through its four year time frame, resulting in major calculation errors. How has SCAG accounted for the 2010 census and its inevitable change to the population assumptions in this RTP? What is the measure of error built into this RTP?

**In summary:**

SCAG's Regional Transportation Improvement Program (RTIP) is mentioned in the "Public Participation and Consultation Report", page 44, which is a capital listing of all transportation projects proposed over a six-year period and amended several times a year. This capital listing identifies specific funding sources and funding amounts for each project and federal law requires that the RTIP be consistent with the RTP. Within the 2008 Final RTP forecasting future possibilities to the year 2035, the RTP and Program EIR should mention the above potential projects for informational and possible future funding purposes.

We all need to continue to enhance efforts to develop and nurture relationships with elected and public officials throughout the SCAG region, especially for Imperial County that is a traditionally under-represented area in this region.

Without SCAG's full support of transportation and aviation projects, e.g. the Brawley Bypass, re-opening of the San Diego & Arizona railroad line, NAF/EI Centro proposed expansion activities, Imperial County needs to continue to have appropriate financing mechanisms to have see future projects successfully implemented in a timely manner.

It is important for SCAG staff and its member agencies to realize that the existing, proposed and future growth of the County of Imperial is dependent upon adequate support and funding for future transportation projects that implement the transportation mitigation programs and measures, e.g. increasing rideshare, investments in non-motorized transportation, goods movement capacity enhancements, and key transportation investments targeted to reduce heavy-duty truck delay.

The continuing existing delays along the two Mexican international border crossings in Imperial County through Calexico and the East Border Crossing are becoming longer and longer and additional traffic/travel lanes are needed in the very near future to reduce congestion and reduce the ever-increasing air pollution from automobiles and trucks that are stalled in line.

The Imperial County Planning and Development Services Department looks forward to reviewing and possibly providing additional comments on the Final 2008 Regional Transportation Plan and the Program Environmental Impact Report when these documents are received from SCAG staff. We thank SCAG staff for your tremendous efforts on this document and look forward to some clarification.

If you have any questions, please feel free to contact me at (760) 482-4236, extension 4310, or by e-mail at [jurgheuberger@imperialcounty.net](mailto:jurgheuberger@imperialcounty.net)

Sincerely,



Jurg Heuberger, AICP, CEP  
Planning and Development Services  
Department Director

cc: Board of Supervisors  
John Edney, El Centro Mayor  
Ralph Cordova, County Counsel  
Robertta Bums, County Executive Officer  
IVAG Regional Council Members  
William Brunet, County Public Works Director  
Kathy Williams, Administration Analyst III  
Steve Birdsall, County Ag. Comm/APCO  
Jeff Lamoure, EHS/Health Department  
Fred Nippins, Chief, Imperial County Fire/OES  
Gordon Gaste, City of Brawley Planning Director  
Armando Villa, City of Calexico Planning Director  
Jessie Soriano, City of Calipatria Planning Director  
Norma Villicana, City of El Centro Acting Planning Director  
Gerry Peacher, City of Holtville Planning Director  
Jorge Galvan, City of Imperial Planning Director  
Joel Hamby, City of Westmorland Planning Director  
Darrell Gardner, Asst. Planning & Dev. Services Director  
Jim Minnick, County Planning Division Manager  
SCAG Correspondence File  
Files: 10.101/10.102/10.105/10.277/10.328



SEAN JOYCE, City Manager

JS

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575

(949) 724-6249

February 15, 2008

Ms. Jessica Kirchner  
Senior Regional Planner  
Air Quality Conformity  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

Dear Ms. Kirchner:

The City of Irvine has reviewed the 2008 Draft Regional Transportation Plan (RTP) and Draft Program Environmental Impact Report (DPEIR). The City opposes the policy direction of the overall document, and notes a number of concerns regarding the DPEIR. As a preliminary matter, the City of Irvine has filed a petition for writ of mandate against the Southern California Association of Governments (SCAG), challenging SCAG's allocation to Irvine of dwelling units under the draft and final Regional Housing Needs Assessment (RHNA) for the current housing cycle. For reference, the case is *City of Irvine v. SCAG*, Orange County Superior Court Case No. 07CC08301 (the "Petition"). By submitting this letter in opposition to the draft RTP and DPEIR, the City of Irvine in no manner waives any arguments or positions that it has asserted in the Petition, and preserves any and all rights, and remedies as may be ordered pursuant to the allegations for relief in the Petition.

With that initial disclosure, the City opposes the draft RTP and DPEIR for the reason that if either document is approved by SCAG without addressing the comments and concerns set forth in this letter, SCAG will fail to proceed in manner as prescribed by law, will prejudicially abuse its discretion by exceeding its legal authority, will fail to support its official actions with sufficient evidence, and/or will fail to perform a clear, present, mandatory, and ministerial duty. As a Metropolitan Planning Organization (MPO) under pertinent federal law and a council of government formed and existing pursuant to a joint powers agreement under pertinent state law, SCAG's authority and powers in drafting and producing the RTP is limited by and confined to federal and state statute. Of primary significance, the development of the RTP and the RTP itself should follow a "bottom-up" rather than a "top-down" approach to reporting the regional transportation needs and plans. Instead, SCAG has developed a draft RTP that would dictate to local jurisdictions land use requirements under the guise of creating a transportation plan. This approach violates clear mandates from applicable federal and state law.

SCAG's authority to prepare and adopt the RTP is set forth in Government Code section 65080-65086.5 (the "State RTP Law"), which clearly provides that only *transportation systems* are to be analyzed and included as part of the plan. (Gov. Code § 65080(a).) Even more pertinent, SCAG *must consider and incorporate* into the RTP the transportation plans of "cities, counties, districts, private organizations, and state and federal agencies." (*Ibid.*) Thus, under state law, SCAG must consider and incorporate the City of Irvine's transportation plans, which have been constantly reviewed and thoughtfully considered as part of the City's General Plan and other related land use documents.

Furthermore, federal law requires SCAG to consider the City's General Plan and related transportation planning documents. Pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), an MPO such as SCAG is required to implement a planning process that provides for consideration of projects and strategies that will, among other things, "promote consistency between transportation improvements and State and local planned growth and economic development patterns[.]" (23 U.S.C. § 134(h) (1)(E).) Likewise, the transportation plan required to be produced pursuant to SAFETEA-LU (i.e., the RTP) must consider local planned growth and economic development patterns as it relates to a 20-year forecast period. (*Id.*, § 134(i)(2)(A).) Indeed, SCAG is required to consult with the City of Irvine for land use management, natural resources, environmental protection, conservation, and historic preservation in connection with the development of a long-range RTP. (*Id.*, § 134(i)(4)(A).) To the extent that SCAG and the draft RTP do not meet these requirements under federal law, the City hereby formally opposes certification of the RTP by the Secretary of the United States Department of Transportation. (Refer to *id.*, § 134(k)(5)(A).)

In addition to the failure to adequately consider and incorporate Irvine's planned growth and transportation-related forecasts, SCAG has exceeded the limited scope of the contents that are to be in the RTP. The State RTP Law requires the RTP to include only a "policy element," an "action element," and a "financial element." (Gov. Code § 65080(b).) The items to be discussed and analyzed in each element are likewise set forth in statute. (*Ibid.*) The City is gravely concerned and opposes the draft RTP for failing to follow the statutorily imposed limits on the content of the RTP.

Furthermore, the ability of SCAG to propose and approve an "alternative" planning scenario is expressly limited by law. First, an alternative planning scenario must accommodate the same amount of population growth as projected in the baseline plan but shall be based on an alternative that attempts to reduce the growth in traffic congestion, make more efficient use of existing transportation infrastructure, and reduce the need for costly future public infrastructure. (Gov. Code § 65080.3(b).) Second, the alternative planning scenario and accompanying report *cannot* be adopted as part of the RTP. (*Id.* § 65080.3(f).) Third, and perhaps most significant, is the re-affirmation that SCAG *has no land use authority* because state law specifies that the preparation of an *alternative planning scenario grants no direct or indirect authority over local land use*

*decisions.* (*Id.* § 65080.3(g).) To the extent the draft RTP includes the "Plan," "Envision" or other "Alternatives" that deviate from a "Baseline" growth scenario, SCAG *cannot* by law include that as part of the RTP. Moreover, the RTP cannot include its Compass Blueprint Program by using assumptions from that program as the justifications for the RTP. In view of the legal framework discussed above, the City's comments and concerns are as follows:

**1. Remove policies and mitigation measures in the draft RTP and DPEIR that are not related to transportation project delivery and implementation.**

As stated, SCAG, as the designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, including Orange, Los Angeles, San Bernardino, Riverside, Ventura, and Imperial counties, is responsible for the development of a Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) and for ensuring that the plan and program meet the air quality conformity requirements of the federal Clean Air Act.

SCAG's additional functions include intergovernmental review of regionally significant development projects, periodic preparation of the RHNA, and serving as the area wide wastewater treatment management-planning agency under the federal Clean Water Act.

In accordance with State law as discussed, land use authority belongs to local jurisdictions. The State requires that cities have approved General Plans to plan for future growth. The City of Irvine has an approved General Plan, which designates land use types and intensities. Irvine has been internationally recognized as a master planned community, well known for its quality of life. Irvine is unique as it was developed in accordance to a master plan that carefully considered the balance of population and employment; provisions of public land for parks, open space, schools, and public facilities; and construction of infrastructure to support the land use designations, including streets, sidewalks, bikeways, and transit corridors. Implementation of the proposed SCAG RTP land use plan would seriously undermine this effort, and as stated in the introduction to this letter, would be inconsistent with SCAG's legal authority.

Several of the policies and mitigation measures contained in the RTP and associated DPEIR include measures related to land use policies. While the federal SAFETEA-LU contains policies that encourage regional land use coordination, it does not expand SCAG's authority to dictate land use. Both the Plan and the Envision alternatives call for land use designations, patterns, intensities, and policies that do not comply with the City's well-balanced General Plan. Additionally, SCAG's plan forecast differs significantly from demographic assumptions of Irvine's General Plan. At the census tract/traffic analysis zone level, locations of future growth according to SCAG's Plan Alternative would shift significantly compared with Irvine's General Plan. This shift would increase

population, employment, and housing growth and exceed the capacity of planned infrastructure. This growth is inconsistent with Irvine's well-balanced General Plan.

The Draft RTP and DPEIR also include a land use map based on the policy growth forecast that designates the types and intensities of land use. As stated, SCAG does not have the authority to designate land uses and development standards for cities within the region. Therefore, all maps or text related to designating land use and development standards should be removed from the 2008 Draft RTP and DPEIR.

It is also important to note that we have identified a number of errors in the land use demographic assumptions and policy mapping that we previously provided to SCAG staff and are reiterating in this letter. These errors are reflected on a variety of graphics generated by the SCAG including but not limited to the Draft Baseline Growth Forecast map, the Draft Policy Growth Forecast map, and the Compass Blueprint 2 percent Strategic Opportunities Area map. While the City of Irvine acknowledges the efforts of SCAG to encourage more sustainable development by focusing housing and employment near transit stations or transportation corridors, the maps are not consistent with the City's land use maps. City of Irvine staff has expressed concerns with these errors to SCAG staff at previous meetings and workshops, yet corrections to the graphics have not been made. Examples include:

- Areas that are identified for "Office Park" on the SCAG maps have an existing "Residential" land use designation. Residential projects with varying densities are either existing or planned for these areas.
- Areas that are identified to be developed with higher residential densities are areas that already developed with new residential, office, or retail uses. These areas will not be redeveloped within the time horizon identified in the 2008 Draft RTP.
- Areas identified for "Industrial" uses are within planning areas experiencing mixed-use development. According to SCAG's development standards, the residential density for "Industrial" areas is zero households per acre. The City is currently processing applications for mixed-use projects in several of these areas.

The use of these erroneous assumptions demonstrates further serious flaws in the proposed policy. The City of Irvine requests a meeting with SCAG staff to discuss the specifics of these errors and provide a better understanding of the City of Irvine's land use planning efforts.

Therefore, the City of Irvine requests that SCAG remove all policies, maps, development standards, and mitigation measures in the 2008 draft RTP and DPEIR that are not related to transportation project delivery and implementation, and remove mitigation measures with questionable requirements. Many of the mitigation measures of concern also appear to be draft Regional Comprehensive Plan policies that have been carried over into the 2008 RTP as proposed mitigation measures. As the RCP has not yet been formally released for public review, the use of RCP policies as mitigation measures without proper vetting is premature. Development standards and mitigation measures that have no bearing on the mitigation of transportation project delivery should be removed from the DPEIR.

- 1. Utilize the 2006 Orange County Projections (RTP Baseline) in any adopted 2008 RTP growth forecast, consistent with adopted policy directive from the boards of directors of OCCOG and OCTA.**

The RTP DPEIR analyzes three alternatives: the Plan, Envision, and Baseline. The Plan and Envision alternatives do not accurately reflect population and employment projections provided by Orange County Council of Government in 2006 (2006-OCP). The RTP and related DPEIR do not accurately reflect this data.

The 2008 RTP includes discussion of two different demographic forecasts for the SCAG region between 2008 and 2035, including a baseline forecast and a policy growth forecast. SCAG's baseline forecast was developed through a bottom-up approach and is consistent with local general plans. In November 2006, the OCTA Board requested that SCAG use the 2006 Orange County Projections (OCP-2006) as the basis for Orange County demographics in the 2008 RTP. The OCP-2006 is the countywide demographic dataset developed by the Center for Demographic Research with input from all 34 cities and the County of Orange. The baseline forecast is consistent with OCP-2006 in Orange County.

The policy growth forecast, referred to as the "Plan" forecast, however, is shaped by the Compass Blueprint Program. The Plan forecast is generally consistent with OCP-2006 through 2015. After that time, SCAG redistributes jobs and housing to cluster future growth around major transit corridors, transit stations, and job and activity centers known as "Areas of Opportunity". On a regional level, growth is shifted from inland counties to coastal counties in an effort to reduce vehicle miles traveled by more closely locating jobs and housing. Compared with the baseline growth forecast, the Plan forecast would add an additional 45,000 people, 15,000 households, and 9,500 jobs throughout Orange County by year 2035. Three areas of Irvine have been identified in the Compass Blueprint as "Areas of Opportunity", including the Irvine Metro (locally referred to as the Irvine Business Complex or IBC) and TOD in the areas around Irvine Station and Tustin Station. It is important to note that implementation of the

City's General Plan will result in sustainable, politically acceptable growth in these areas. The high levels of growth that the Plan forecast assumes for these areas are not only inconsistent with the City's General Plan, they would likely result in significant negative impacts in State and federal environmental review focus areas such as public services (education, public safety, recreation), noise, visual impacts, public utilities, water resources, and biological resources. In addition, the Plan forecast does not account for land use constraints such as open space and hazard areas, nor does it recognize existing project approvals or land use designations.

Although the SCAG Regional Council will have an opportunity to select either growth forecast when the final 2008 RTP is adopted, the draft 2008 RTP refers almost exclusively to the Plan forecast, and the draft finding of air quality conformity was based on that forecast. In addition, the DPEIR does not include analysis of a specific alternative that links the baseline growth forecast with the planned transportation improvements, such as Renewed Measure M, that are planned throughout 2035. As such, the DPEIR is insufficient because it does not look at all possible environmental impacts that may result from whichever alternative is adopted.

The DPEIR alternatives should include a Baseline + Approved Transportation Projects alternative with an air quality conformance test absent of land use policies. Furthermore, the mitigation measures should be limited to transportation projects. However, recognizing that there is insufficient employment in Riverside and San Bernardino Counties to support the population, the City of Irvine would be supportive of incentives for job creation in those counties to reduce the congestion on freeways, such as State Route (SR) 91.

**2. Include OCTA's list of transportation projects submitted to SCAG for incorporation into the 2008 RTP, including corrections to the Constrained and Strategic Plans to accurately reflect the status of proposed projects.**

The RTP consists of two major sections: a financially constrained plan and a strategic plan. The constrained plan includes transportation projects for which there are committed or "reasonably available" funding sources. The strategic plan identifies projects that do not have a complete funding plan or require further study and consensus building before moving into the constrained plan. All regionally significant transportation projects must be included in the constrained plan to move through the project delivery process and receive State or federal funding for design and construction.

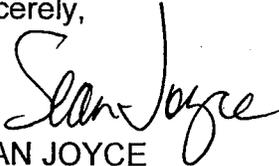
The following two controversial projects have been included in the Constrained Plan although neither project has identified "reasonably available" funding sources:

- a. Orangeline Magnetic Levitation Project (Orangeline Project): This project should be removed from the constrained RTP placed in the strategic plan until such time as full funding and local commitment are secured.
- b. Riverside-Orange County Corridor: This project should be removed from the constrained RTP until such time as full funding and local commitments are secured, and the project's environmental impacts and constraints are addressed. This change would be consistent with the 2006 RTP. It should be noted that on October 25, 2005, the Irvine City Council adopted a resolution opposing the consideration of any proposed tunnel alternative that would be built in the Cleveland National Forest or link Interstate 15 in Riverside County to the State Route 133 Toll Road in the City of Irvine.

These projects should be removed from the Constrained Plan, placed in the Strategic Plan, and a new air quality conformance should be conducted.

We are aware that other public agencies in Orange County oppose the draft RTP. The City of Irvine therefore requests that SCAG reconsider the proposed RTP in light of the major issues raised in the review and comment process.

Sincerely,



SEAN JOYCE  
City Manager

- Cc: The Honorable Yvonne-Brathwaite Burke, President, Southern California Association of Governments, 818 West Seventh Street, 12<sup>th</sup> Floor, Los Angeles, CA 90017-3435  
Hasan Ikharta, Executive Director, Southern California Association of Governments, 818 West Seventh Street, 12<sup>th</sup> Floor, Los Angeles, CA 90017-3435  
Richard Dixon, OCCOG Chair, Mayor, City of Lake Forest, 25550 Commercentre Drive, Suite 100, Lake Forest, CA 92630  
Tracy Sato, OCCOG TAC Chair, City of Anaheim, 200 S. Anaheim Blvd. Anaheim, CA 92805  
Dennis Wilberg, OCCOG Interim Executive Director, City Manager, City of Mission Viejo, 200 Civic Center, Mission Viejo, CA 92691  
Gail Shiomoto-Lohr, GSL Associates, c/o City of Mission Viejo, 200 Civic Center, Mission Viejo, CA 92691  
Deborah Diep, Director, Center for Demographic Research, 2600 Nutwood Avenue, Suite 750, Fullerton, CA 92831-6850  
Wally Kreutzen, Assistant City Manager  
Sharon Landers, Assistant City Manger

Ms. Jessica Kirchner  
February 15, 2008  
Page 8

Manuel Gomez, Director of Public Works  
Douglas Williford, Director of Community Development Department  
Mark Asturias, Housing Manager  
Brian Fisk, Manager of Planning and Redevelopment  
Cindy Krebs, Manager of Transit and Transportation  
Barry Curtis, Principal Planner  
Bill Jacobs, Principal Planner  
Katie Berg-Curtis, Project Development Administrator  
Jolene Hayes, Supervising Transportation Analyst  
Marika Modugno, Senior Planner  
Phil Kohn, Rutan and Tucker  
Bill Ihrke, Rutan and Tucker



Alan L. Murphy  
Airport Director

February 19, 2008

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

**Subject: Draft 2008 RTP**

Dear Ms. Meaney:

Thank you for the opportunity to review the Draft 2008 Regional Transportation Plan (RTP) and the Draft 2008 Regional Transportation Plan - Program Environmental Impact Report (PEIR) as it relates to John Wayne Airport (JWA). At this time we offer the following comments:

- 1) Within the RTP Regional Aviation Policies (page 8 of the Draft Aviation and Airport Ground Access Report), one of the Aviation Guiding Principles is to "Reflect that the region as a whole has an obligation to help pay the costs of airport environmental mitigation and ground access improvement in counties that serve a disproportionate share of regional air travel demand at their airports." We would appreciate some clarification as to whether this principle was presented to and approved by the Aviation Technical Advisory Committee (ATAC) and/or the Aviation Task Force (ATF). Further, we request that this wording be changed to state that counties within the region should communicate regarding and, where appropriate, coordinate their efforts with respect to planning and implementation of airport ground access initiatives that cross jurisdictional boundaries.
- 2) On January 31, 2008, the Southern California Regional Airport Authority (SCRAA) Board of Directives voted to disband the organization. As a result of this action, we recommend that the Regional Aviation Policies associated with SCRAA be removed from the Aviation and Airport Ground Access Report.

As you continue to finalize the Draft 2008 RTP, JWA will provide additional comments on aviation policy issues.

Sincerely,

  
Alan L. Murphy  
Airport Director

cc: County Executive Officer

3160 Airway Avenue  
Costa Mesa, CA  
949.252-4608  
949.252.5171  
949.252.5178 fax  
www.ocair.com



---

Community Development Department

February 19, 2008

Ms. Jessica Meaney  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**SUBJECT: COMMENTS ON THE DRAFT 2008 RTP**

Dear Ms. Meaney:

The City of La Palma has several concerns with the Draft 2008 RTP. The City continues to be opposed to use of the Pacific-Electric right-of-way for transit purposes. Attached to this letter are previously adopted resolutions of the City Council expressing their concern with the potential quality of life impacts for the residents of La Palma associated with the development of the right-of-way for MagLev.

In addition, the City also has concerns with utilizing SCAG's Policy Growth Forecast data. The City of La Palma would recommend that SCAG use the 2006 Orange County Projections in any adopted 2008 RTP growth forecast.

The City of La Palma appreciates the opportunity to provide comment on the Draft 2008 RTP. Please contact me at (714) 690-3322, should you have any questions.

Sincerely,



John J. Di Mario  
Community Development Director

Attachments: Resolution 2005-17  
Resolution 2007-08

RESOLUTION NO. 2005-17

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY  
OF LA PALMA EXPRESSING ITS OPPOSITION TO THE  
USE OF THE PACIFIC-ELECTRIC RIGHT-OF-WAY  
ABUTTING THE CITY OF LA PALMA FOR TRANSIT  
PURPOSES**

WHEREAS, a portion of the City of La Palma is adjacent to the former Pacific-Electric Right-of-Way; and

WHEREAS, a number of agencies and consortiums are investigating the feasibility of developing the Pacific-Electric Right-of-Way; and

WHEREAS, the City Council of the City of La Palma is concerned about protecting and preserving the quality of life within the City of La Palma, including those residents living adjacent to the Pacific-Electric Right-of-Way; and

WHEREAS, the City Council of the City of La Palma is generally supportive of regional transportation alternatives as long as they do not impact or interfere with the quality of life within the City of La Palma; and

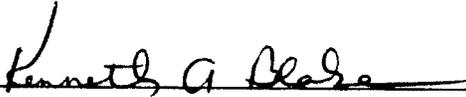
WHEREAS, the City Council of the City of La Palma has previously expressed its concerns with the potential quality of life impacts associated with the development of the Pacific-Electric Right-of-Way for transit purposes to the Orange County Transportation Authority through its West Orange County Project Definition Study; and

WHEREAS, the City Council of the City of La Palma has previously indicated its concerns with the potential quality of life impacts associated with the development of the Pacific Electric Right-of-Way for MagLev transit purposes by the Orangeline Joint Powers Authority and has chosen not to participate in such an endeavor; and

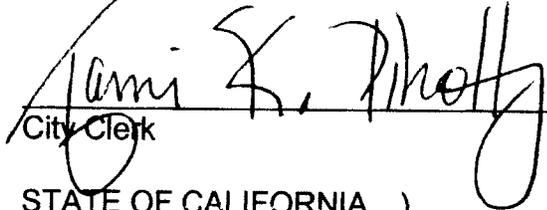
WHEREAS, there continue to be questions raised by residents about the City of La Palma's position on this issue.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of La Palma wishes to reaffirm its position of opposition to any development of the Pacific Electric Right-of-Way, where it abuts the City's jurisdictional boundaries, for transit or transportation purposes.

APPROVED AND ADOPTED by the City Council of the City of La Palma at a regular meeting held on the 5<sup>th</sup> day of April 2005.

  
\_\_\_\_\_  
Mayor

ATTEST:

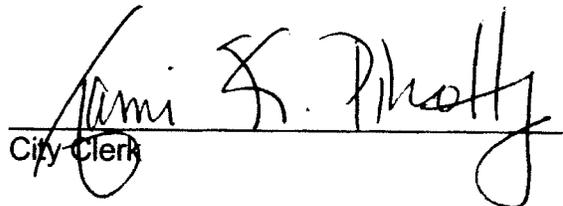
  
\_\_\_\_\_  
City Clerk

STATE OF CALIFORNIA )  
COUNTY OF ORANGE ) SS  
CITY OF LA PALMA )

I, Tami K. Piscotty, City Clerk of the City of La Palma, California, DO HEREBY CERTIFY that the forgoing resolution was adopted by the City Council of said City at a regular meeting of said City Council held on the 5<sup>th</sup> day of April 2005, and that it was so adopted by called vote as follows:

AYES: Barnes, Blake, Herman, Rodriguez, Waldman

NOES: None

  
\_\_\_\_\_  
City Clerk

**RESOLUTION NO. 2007 - 08**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LA PALMA EXPRESSING ITS OPPOSITION TO THE USE OF THE PACIFIC-ELECTRIC RIGHT-OF-WAY ABUTTING THE CITY OF LA PALMA FOR TRANSIT PURPOSES**

**WHEREAS**, a portion of the City of La Palma is adjacent to the former Pacific-Electric Right-of-Way; and

**WHEREAS**, a number of agencies and consortiums are investigating the feasibility of developing the Pacific-Electric Right-of-Way; and

**WHEREAS**, the City Council of the City of La Palma is concerned about protecting and preserving the quality of life within the City of La Palma, including those residents living adjacent to the Pacific-Electric Right-of-Way; and

**WHEREAS**, the City Council of the City of La Palma is generally supportive of regional transportation alternatives as long as they do not impact or interfere with the quality of life within the City of La Palma; and

**WHEREAS**, the City Council of the City of La Palma has previously expressed its concerns with the potential quality of life impacts associated with the development of the Pacific-Electric Right-of-Way for transit purposes to the Orange County Transportation Authority through its West Orange County Project Definition Study; and

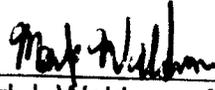
**WHEREAS**, the City Council of the City of La Palma has previously indicated its concerns with the potential quality of life impacts associated with the development of the Pacific Electric Right-of-Way for MagLev transit purposes by the Orangeline Joint Powers Authority and has chosen not to participate in such an endeavor; and

**WHEREAS**, questions continue to be raised by residents about the City of La Palma's position on this issue; and

**WHEREAS**, the City Council of the City of La Palma did formerly state its opposition to any development of the Pacific Electric Right-of-Way, where it abuts the City's jurisdictional boundaries, for transit or transportation purposes in Resolution 2005-17 on April 5, 2005 and wishes to reconfirm that opposition.

**NOW, THEREFORE, BE IT RESOLVED** that the City Council of the City of La Palma wishes to reaffirm its position of opposition to any development of the Pacific Electric Right-of-Way, where it abuts the City's jurisdictional boundaries, for transit or transportation purposes.

**APPROVED AND ADOPTED** by the City Council of the City of La Palma at a regular meeting held on the 6th day of March 2007.

  
\_\_\_\_\_  
Mark I. Waldman, Mayor

ATTEST:

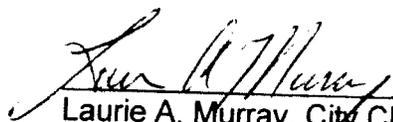
  
\_\_\_\_\_  
Laurie A. Murray, City Clerk

STATE OF CALIFORNIA )  
COUNTY OF ORANGE ) SS  
CITY OF LA PALMA )

I, Laurie A. Murray, City Clerk of the City of La Palma, California, DO HEREBY CERTIFY that the forgoing resolution was adopted by the City Council of said City at a regular meeting of said City Council held on the 6th day of March 2007, and that it was so adopted by called vote as follows:

AYES: Barnes, Charoen, Herman, Rodriguez, Waldman

NOES: None

  
\_\_\_\_\_  
Laurie A. Murray, City Clerk



# CITY OF LAGUNA HILLS

*City Council*

**MAYOR**

*L. Allan Songstad, Jr.  
MAYOR PRO TEMPORE  
Joel Lautenschleger*

February 19, 2008

**COUNCIL MEMBERS**

*Randal Bressette  
Melody Carruth  
R. Craig Scott*

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

Dear Mr. Ikhata:

**RE: City of Laguna Hills Comments regarding SCAG's Draft 2008 Regional Transportation Plan, Draft RTP Program Environmental Impact Report, and Draft RTP Growth Forecasts**

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2008 Regional Transportation Plan (RTP). On behalf of the City of Laguna Hills City Council, I respectfully submit the following policy-level comments and recommendations on the draft 2008 RTP, draft Program EIR, and draft RTP growth forecasts.

The City's comments and recommendations focus on two (2) key areas, as follows:

- 1) The RTP growth forecast that will be selected for the SCAG region;
- 2) Mitigation measures proposed in the draft RTP EIR.

**Recommendation No.1 - SCAG's RTP Growth Forecast:**

***SCAG's adoption of a regional growth forecast for the 2008 RTP shall utilize, for Orange County, the Orange County Projections-2006 (OCP-2006) database, as adopted by the Orange County Council of Governments (OCCOG) on November 30, 2006.***

At a policy level, the City of Laguna Hills believes that:

- a) Recommendation #1 is consistent with adopted policy directive from the boards of directors of OCCOG and the Orange County Transportation Authority to use OCP-2006 as the basis for Orange County demographics in the 2008 RTP.
- b) OCP-2006 accurately represents the distribution and amount of population, households and employment that are forecast individually for the City of Laguna Hills

and for Orange County, and is developed from a "bottoms-up" collaboration of Orange County jurisdictions and the Center for Demographic Research at CSUF.

- c) OCP-2006 is the only database that has been approved by Orange County jurisdictions to accurately represent the latest available estimates and assumptions for population, land use and employment through Year 2035 in Orange County.
- d) Adopting an alternate distribution of growth for Orange County contrary to OCP-2006 would fail to represent Orange County and local jurisdiction land use plans, especially in relation to the 14,000 housing units and 16,000 jobs approved in the Ranch Plan Planned Community in South Orange County unincorporated area.

For example, SCAG's RTP Policy Growth Forecast significantly reduces the Ranch Plan entitlement, by shifting almost 9,000 households (out of 14,000 residential units) and 11,000 jobs (out of 16,000 jobs) from the Ranch Plan entitlement and shifting these households and jobs to other Orange County locations where such intensification is contrary to local plans, such as in the cities of San Clemente, San Juan Capistrano, and Irvine.

The OCP-2006 projections, which were reviewed by major Orange County landowners such as Rancho Mission Viejo and The Irvine Company, appropriately represent the future growth of their landholdings. At present, the only RTP growth forecast that incorporates the OCP-2006 projections is the SCAG RTP Baseline Growth Forecast.

- e) The Center for Demographic Research at CSU Fullerton, which conducts the Orange County Projection Series, has identified a number of errors with the SCAG RTP Policy Growth Forecast that will require significant correction and amendment to appropriately represent Orange County's future growth as accounted for in OCP-2006.
- f) Adopting an alternate distribution of growth for Orange County contrary to OCP-2006, and using such an alternate distribution of growth in regional transportation analyses, could significantly distort the transportation needs and transportation capacity of planned Orange County regional improvements, such as the Foothill Transportation Corridor-South (SR-241) extension.
- g) Any growth forecast database adopted by SCAG as the regional growth forecast is required by State law to be used in county and local transportation models, in compliance with State Government Code 65089(c), which requires consistency in database between the regional SCAG transportation model, county models, and local sub-area models.
- h) OCP-2006 and its integration into the SCAG RTP Baseline Growth Forecast represent the most likely growth projection for Orange County and should therefore be approved as the SCAG region's growth forecast. As stated above, any adoption of a regional forecast that does not include OCP-2006, would distort the modeling of transportation needs and transportation capacity.

In addition to the policy-level comments above, the City of Laguna Hills has specific concerns about the generalized approach exhibited in SCAG's Compass Blueprint 2% Strategy (the basis for the Policy Growth Forecast) of intensifying land uses within ½ mile of transit facilities. Although the City does not oppose the concept of intensifying land uses in those areas around regional transit facilities, the implementation strategy of simply drawing a ½ mile radius around these facilities ignores the realities associated with existing topography and land uses within this radius that are inappropriate and/or infeasible to intensify. For example, the ½ mile radius surrounding the Metrolink Station in the City of Laguna Niguel appears to capture a portion of the Nellie Gail Ranch equestrian community within the City of Laguna Hills. See attached (Year 2035 Difference: SCAG Draft Policy Forecast – OCP 2006 Households) Map. This equestrian neighborhood consists (on average) of one (1) acre residential estates built pre-dominantly on significant hillside slope areas. Not only is this a very low density residential community, but the existing steep slope conditions significantly discourage development on most of the land area. The City would respectfully request that the Nellie Gail Ranch neighborhood be eliminated from the ½ mile radius area surrounding the Metrolink Station in the City of Laguna Niguel.

**Recommendation No. 2 - 2008 RTP Draft EIR Mitigation Measures**

***SCAG shall remove those mitigation measures in the draft RTP EIR that would be applied to RTP transportation projects but which have no bearing on transportation project mitigation or transportation project delivery.***

***SCAG shall remove those mitigation measures in the draft RTP EIR that are proposed to be applied to local agency land use actions, such as General and Specific Plans and individual development projects, separate and distinct from transportation project delivery.***

At a policy level, the City of Laguna Hills believes that:

- a) The draft RTP EIR presents a framework of mitigation measures that implementing agencies and local Lead Agencies (such as cities) would be responsible for ensuring adherence as specific RTP projects are considered for approval over time.
- b) The draft RTP EIR states that Lead Agencies (such as cities) shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process.
- c) Included in the listing of draft RTP EIR mitigation measures are measures relating to housing need, land use, and re-zoning strategies to promote mixed use and compact growth, solid waste requirements and programs, school capacity analyses and recreation and open space planning, among others.
- d) Certifying an EIR that includes mitigation measures, as identified in (c) above, would complicate and delay transportation project environmental clearances by requiring local agencies responsible for implementing 2008 RTP transportation projects to respond to, and comply with, mitigation measures beyond the scope of transportation project implementation and delivery. Following is a list of the measures that fall within this category, which should be deleted:

- Land Use: Mitigation Measures - MM-LU.10, MM-LU.11, and MM-LU.14
- Energy: Mitigation Measure - MM-EN.17
- Open Space: Mitigation Measures – MM-OS.11, MM-OS.23, MM-OS.31 thru 36, MM-OS.39 thru 45
- Solid Waste: Mitigation Measures - MM-PS.7 thru 15, MM-PS.17 thru 24
- Water: Mitigation Measures - MM-W.20 thru 23, MM-W.30 and 32, MM-W.35

In closing, The City of Laguna Hills supports the timely adoption of the 2008 RTP to enable critical transportation improvements to proceed forward in their future environmental clearances and project delivery. The policy-level recommendations identified above will ensure that Orange County's transportation needs match Orange County's planned growth. The recommendations identified above also ensure that future environmental clearances for 2008 RTP transportation projects will not be burdened with mitigation requirements that bear no relationship to transportation project implementation.

On behalf of the City of Laguna Hills, I also extend our appreciation for your personal outreach to better understand Orange County's comments and issues associated with the 2008 RTP, and with your meeting with the South Orange County mayors and city managers in January 2008 to discuss the 2008 RTP.

Sincerely,

*L. Allan Songstad Jr. (98)*

L. ALLAN SONGSTAD JR.  
Mayor  
City of Laguna Hills

Attachment – CDR Map (Year 2035 Difference: SCAG Draft Policy Forecast Minus OCP 2006 Households)

cc: City of Laguna Hills City Council  
City of Laguna Hills City Manager  
City of Laguna Hills City Attorney  
City of Laguna Hills Director of Community Development  
City of Laguna Hills Director of Public Works  
Ms. Jessica Kirchner, SCAG  
Mr. Ryan Kuo, SCAG  
Ms. Jessica Meaney, SCAG  
Dr. Frank Wen, SCAG  
Mr. Darin Chidsey, SCAG  
Ms. Deborah Diep, Center for Demographic Research

Year 2035 Difference:  
SCAG Draft Policy Forecast - OCP 2006  
Households

**Legend**

- City Boundary
- 2000 Census Tracts (GDT)

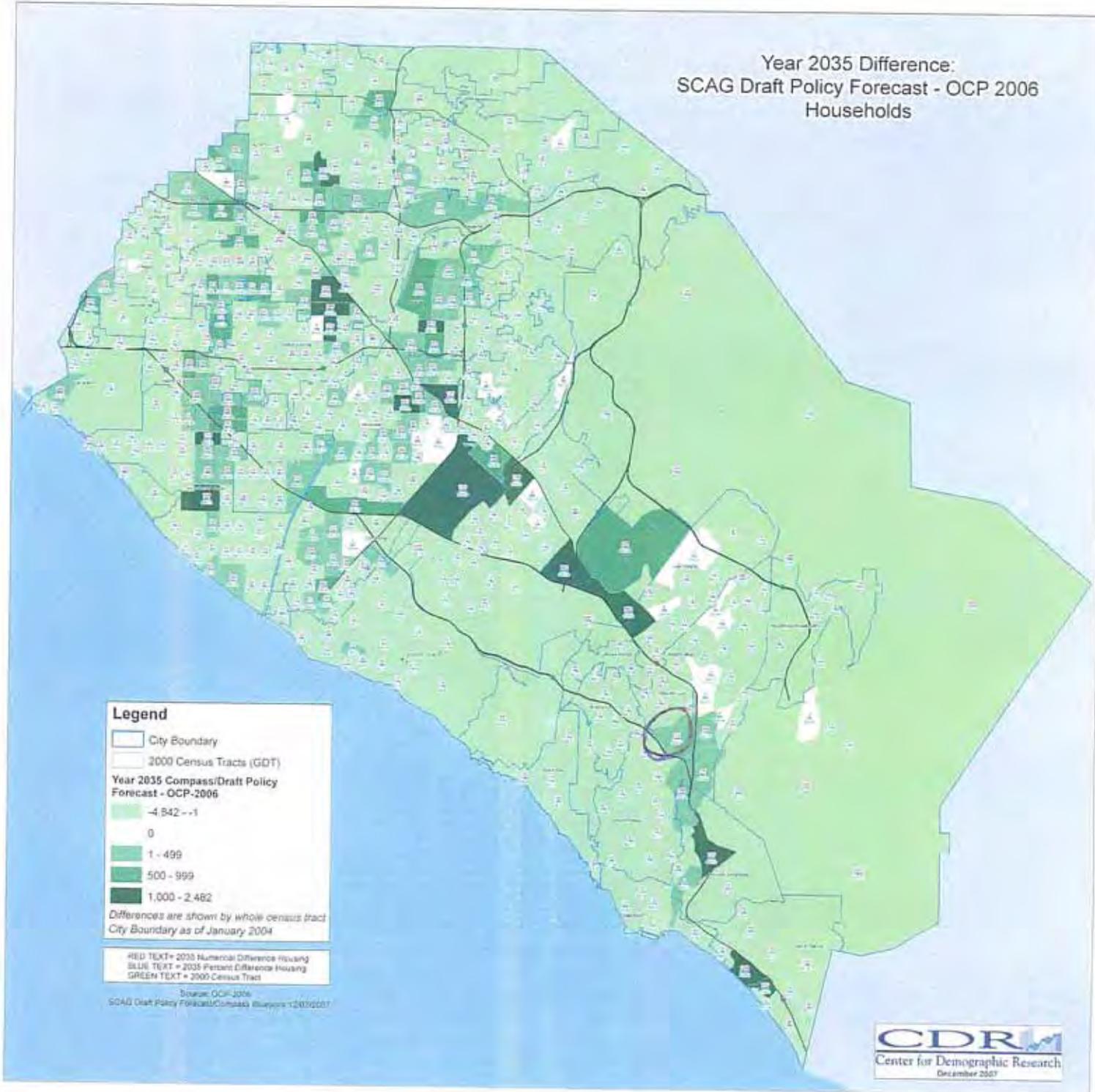
**Year 2035 Compass/Draft Policy Forecast - OCP-2006**

- 4,842 -- -1
- 0
- 1 - 499
- 500 - 999
- 1,000 - 2,482

Differences are shown by whole census tract  
City Boundary as of January 2004

RED TEXT = 2035 Numerical Difference Housing  
BLUE TEXT = 2035 Percent Difference Housing  
GREEN TEXT = 2000 Census Tract

Source: OCP-2006  
SCAG Draft Policy Forecast/Compass Blueprint 12/01/2007





CITY of LAGUNA WOODS

**Bert Hack**  
*Mayor*

February 19, 2008

**Bob Ring**  
*Mayor Pro Tem*

**Robert Bouer**  
*Councilmember*

Ms. Jessica Kirchner  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

**Milt Robbins**  
*Councilmember*

**Brenda B. Ross**  
*Councilmember*

Re: 2008 Regional Transportation Plan and Draft Program  
Environmental Impact Report Comments

**Leslie A. Keane**  
*City Manager*

Dear Ms. Kirchner:

The City of Laguna Woods is very concerned over several issues related to the 2008 Regional Transportation Plan (RTP) and related Draft Program Environmental Impact Report (PEIR).

The distribution of growth in households and employment contained in the RTP's Policy Growth Forecast significantly lowers estimates contained in the City's General Plan, which were included in the Baseline Growth Forecast using data from Orange County Projections 2006. In the three U.S. Census tracts that comprise most of the city, households were reduced by 257 and employment by 1,082. Census tracts that the City shares with adjacent communities also show similar reductions from OCP 2006.

Laguna Woods incorporated in March 1999 and is only nine years old. As a community of seniors with an average age of 78, the City does not have the resources that other cities have to improve their infrastructure and provide services to residents. The City's General Plan provides for balanced growth over the next twenty years, aiming for a mix of commercial and residential development that will help sustain our community. Adoption of the Policy Growth Forecast and efforts to bring the City's General Plan into consistency with it would eliminate this development and the potential to increase resources to serve our residents. I urge you to adopt the Baseline Growth Forecast as the basis for RTP growth projections and for mitigation measures outlined in the PEIR.

As a member of the Orange County Council of Governments (OCCOG) Board of Directors, I strongly support its comments on PEIR Mitigation Measures. And, as a former chair of the San Joaquin Hills Transportation Corridor Agency, I am in full support of the inclusion of the entire length of the SR 241/Foothill Transportation Corridor in South Orange County in the 2008 RTP, including Policy Forecast base

maps. Dropping the alignment to the I-5 freeway would be contrary to its inclusion in previous RTPs. It is an important transportation control measure that deserves continued strong support by SCAG.

It is critical that the 2008 RTP and PEIR be reviewed at all levels of SCAG. The Transportation and Communications Committee (TCC) should be given an opportunity to consider all of the comments provided during the public comment period and staff recommendations before final RTP adoption. Only in this way will the plan receive the thorough vetting it deserves.

I look forward to working with TCC members and staff on the review of the 2008 RTP and draft PEIR. Please contact me at (949) 639-0500 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bert Hack", written in a cursive style.

Bert Hack  
Mayor



# LATINO URBAN FORUM

*improving the quality of life in latino communities*

Jessica Meaney  
Assistant Regional Planner  
Southern California Association of Governments (SCAG)  
818 West Seventh Street, 12th Fl.  
Los Angeles, CA 90017

February 19, 2008

## **SUBJECT: Latino Mobility Needs for SCAG's RTP**

Southern California's growing low-income Latino population mobility patterns rely heavily on non-motorized transportation because of economic reasons. Latinos tend to walk, bike, and use public transit more than any other ethnic/ racial group in the region. Latinos also have the highest rates of pedestrian and bike fatalities in the region.

On Tuesday February 12, 2008 Latino Urban Forum conducted a meeting with local stakeholders to comment on the Regional Transportation Plan, specifically the Environmental Justice Analysis. Based on this meeting below are comments that should be taken into consideration for the Regional Transportation Plan Environmental Justice Report:

1. Overall, stakeholders had a concern that a regional analysis provides blanket statements for equity issues which need to be analysis on a more local level. The EJ Analysis should provide, *at the minimum*, a county-level analysis of ALL indicators. Providing a regional analysis diminishes and precludes any sort of analysis based on *real* income and demographics.
2. Recommendation to separate the investments by mode, income and demographics. Possible overlay of the location of major investments and income in those areas.
3. Comment regarding the share of income paid in taxes for higher versus lower incomes. More analysis is needed for the share of taxes paid.

The Latino Urban Forum recommends the following ideas to improve mobility in low income communities:

1. SCAG should have each jurisdiction develop and adopt a Pedestrian Master Plan because this would insure that the walking needs of the all residents are met.
2. SCAG should have each jurisdiction adopt Complete Street Guidelines, in order to accommodate pedestrian, bike and transit on public right-a-ways.
3. SCAG should make a case for jurisdiction to legalize jitneys and other informal means of transportation.
4. SCAG should encourage shuttle services provided by big box retailers as part of a transportation demand management.
5. SCAG should work with the state, transit agencies and jurisdiction to provide bus shelters and amenities at every bus stop and relocate bus stops that are in front of gas stations

Sincerely,

[latinourbanforum@yahoo.com](mailto:latinourbanforum@yahoo.com)

725 S. Spring Street #12, Los Angeles, CA 90014 213.892-0918

# CITY OF LOS ALAMITOS



**Mayor:**  
Kenneth C. Parker

**Mayor Pro Tem:**  
Gerri L. Graham-Mejia

**Council Members:**  
Catherine A. Driscoll  
Troy D. Edgar  
Dean Grose

**Interim City Manager:**  
David L. Rudat

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February 11, 2008

Dr. Frank Wen  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017—3435

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

Dear Dr. Wen:

The City of Los Alamitos appreciates the opportunity to review the Draft 2008 Regional Transportation Plan (RTP) and Program Environmental Impact Report (PEIR) and respectively submits the following comments for consideration.

We have identified census tracts both in the City of Los Alamitos and in our Sphere of Influence, where we believe the SCAG Growth Policy incorrectly distributes housing and employment growth projections to some areas while not accurately reflecting anticipated growth in other areas.

Examples of these discrepancies include the following:

- The year 2035 Compass/Draft Policy Forecast proposes distributing more than 1200 additional jobs and 800 additional households into Census Tract 1100.06, which comprises Rossmoor, an unincorporated County area located within the City of Los Alamitos' Sphere of Influence. Rossmoor just recently filed a formal application for Incorporation with LAFCO, based in part on the community's expressed desire to maintain the community's stable single family residential character.
- The Policy Growth projections for employment and household growth are significantly higher in the Rossmoor than are forecast for census tracts 1101.08 and 1100.14 directly across the street, where two major arterials, Los Alamitos Boulevard and Katella Avenue, (a designated Super street) intersect and are at the center of the City's commercial area. Here, the Growth Projections show only minor increases of 1% and 4% employment growth in these two census tracts. We would anticipate this area to have a higher projection for increased growth.

- The Growth Policy Forecast for 2035 for Census Tract 1100.14 shows a projected reduction of households in an area zoned for multi family housing which is already experiencing household growth and the area most likely to continue.
- The most significant area of projected decrease in growth to occur is shown in the Census Tract 1100.15 which is home to the Joint Forces Training Base (JFTB), located within the City of Los Alamitos. While the growth forecast policy projects decreases in growth in this area, for both households and employment, the RTP PEIR identifies the Joint Forces Training Base as one of the ten active duty military facilities in the SCAG region whose operations consume a substantial quantity of land. With this information alone, we would have anticipated increased growth projections for this census tract rather than a decrease.
- In addition, the JFTP is currently in the process of preparing a "Master Plan" that will set forth long-range goals and land uses for the base to be able to perform its functional responsibilities as the base transitions from a "strategic reserve force" to an "operational force" support status. In addition, an "Enhanced Use Leasing Program" is being considered for 73 acres of the JFTB, as a proposed funding mechanism to create the funds necessary for base maintenance functions that are not currently being funded. Therefore, this provides additional opportunities for significant growth both in employment and households to be projected for this area instead of the decreased growth projected by the plan.

We recommend that the Policy Growth forecasts be reviewed and adjusted and that SCAG use the 2006 Orange County Projections (OCP) in any Regional Transportation Plan (RTP) growth forecast that is adopted. The Baseline growth forecast is the only SCAG forecast that is consistent with the Orange County Projections 2006 and which incorporates local input. Furthermore, if the Policy Growth forecast is adopted, instead of the Baseline forecast, it will have significant implications for local government including jeopardizing funding eligibility and risking placing cities in the position of having to amend their general plans to maintain consistency requirements.

In addition to our comments regarding the potential for a significant increase in growth occurring at the Joint Forces Training Base (JFTB), we also wanted to highlight the growth inducing impacts that result from the shifts and distribution of growth to the military base in Los Alamitos. The role of this base as a regionally significant transportation facility should be considered in the region's transportation planning efforts given the fact that the JFTB functions as a military airbase facility with both Homeland Security and Office of Emergency Services functions.

Small local jurisdictions, such as Los Alamitos, face significant issues relating to the planning, maintaining and funding of critical transportation infrastructure essential to accommodate the movement of military supplies and personnel in times of national emergency, and to accommodate and mitigate the growth inducing impacts of military funding mechanisms such as Revenue Enhanced Leasing. These impacts, including funding, should be addressed and shared at a regional and national level, taking into consideration the burden a small jurisdiction faces in having to compete with fewer resources and greater demands for funding allocations.

The City of Los Alamitos appreciates the opportunity to provide comments on the Draft 2008 Regional Transportation Plan and Program Environmental Impact Report.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Rudat", written in a cursive style.

David L. Rudat  
Interim City Manager



634 S. Spring Street, Suite 821  
Los Angeles, CA 90014  
Tel 213.629.2142  
Fax 213.629.2259  
[www.la-bike.org](http://www.la-bike.org)

February 15, 2008

Jessica Meaney  
Assistant Regional Planner  
Southern California Association of Governments (SCAG)  
818 West Seventh Street, 12th Fl.  
Los Angeles, CA 90017-3435

RE: Draft 2008 Regional Transportation Plan and Non-Motorized Transportation Report

Los Angeles County Bicycle Coalition (LACBC) is submitting the following comments in response to the draft Non-Motorized Transportation (NMT) Report and the 2008 Regional Transportation Plan (RTP).

### **Introduction**

The NMT Report is a valuable document that clearly articulates the need for and challenges of improving non-motorized infrastructure and policies in the SCAG region. The recommendations found on P.24 and 25 provide a useful starting point. However, they lack goals and targets that are needed to give better guidance to SCAG members.

We strongly recommend SCAG prioritize and fund the Comprehensive Regional Non-Motorized Transportation plan called for in the report as a tool for implementing the report's policies and outcomes.

We believe the following recommendations can enhance the NMT Report and SCAG's efforts to expand non-motorized transportation use.

#### **1- Need for set goals to guide planning and funding**

The NMT Report states: "Regionally, non-motorized travel represents 1% - 10% of all trips respectively, but represents less than 0.46% of all transportation funding in the region." It also points out that the California Blueprint for Bicycling and Walking sets goals towards increasing bicycling and walking trips by 50 percent, decreasing bicycle and pedestrian fatality rates by 50 percent by 2010, and increasing funding for bicycle and pedestrian-related programs." In the absence of such targets, it will be difficult for SCAG's regional members to plan appropriately.

#### **LACBC's recommendations:**

- The RTP should set performance goals for NMT at least commensurate with the state's Blueprint.
- Set funding level goals at least proportionate to trip levels.
- Encourage County Transportation Commissions (CTCs) to use project scoring criteria that gives priority to projects that integrate bicycle accommodations.

#### **2- Need for Complete Streets policies**

The NMT Report states there is a total of 1591 miles of class 2 bike lanes in the SCAG region. But, total arterial roadway miles for the region is more than 40,000 miles, and these are the roads where most major destinations are located. This means that less than 5% of these important roads provide accommodation for the safe travel of cyclists. Cities with high levels of bicycle usage typically have upwards of 30% of roads with bike lanes. Many cities and regions are adopting Complete Streets policies that stipulate that

all roads must integrate facilities for all road users (which includes pedestrians, cyclists, transit users and the disabled) to the greatest extent possible. The Complete Streets approach has a much better chance of making cycling a viable travel choice than does a bikeway network strategy that focuses on a very limited subset of roads.

### **LACBC's recommendations**

- Set a goal that will encourage the provision of bicycle accommodation on 30% of arterial roads.
- Provide resources, incentives and encouragement for SCAG members to adopt Complete Street policies.

### **3- Need for local planning resources**

Currently, many cities do not have the resources to effectively secure funding for NMT planning and projects. Our experience on project review teams has shown us that State Safe Routes to School and Bicycle Transportation Account funding applications from the SCAG region fall short of the quality needed to compete successfully for this funding.

**LACBC's recommendation:** SCAG could make planning resources available to assist cities and counties to more effectively identify and apply for funding for NMT projects. Specifically, SCAG could sponsor a low-cost or no-cost program to provide such assistance throughout the region.

### **4- Need for better data**

The SCAG NMT Report correctly identifies the need for better data on walking and cycling trips. Inconclusive data can give an inaccurate picture of the true potential for non-motorized travel to address myriad regional problems. Unfortunately, regional planning and funding decisions seem to be based on this incomplete picture, resulting in very limited efforts to improve non-motorized travel. In contrast, other MPO regions and cities with similar data limitations *are* choosing to make far more meaningful commitments to NMT planning and funding. Cities like New York and London are making significant investments to NMT. In many cases these investments are paying off handsomely in reduced vehicular travel demand, improved travel choices and other benefits. SCAG needs to investigate what have other MPO regions have done to improve NMT.

**LACBC's recommendation:** SCAG's NMT plan would benefit greatly from a thorough survey of the NMT strategies of other regions and how their investments are paying off.

### **5- Need to adopt measurements that focus on moving people, not vehicles**

The NMT Report cites the need to emphasize the fact that the maximization of "opportunities for bicycling and walking, shifts the focus from safely moving the maximum number of passenger vehicles to safely moving the maximum number of people,"

### **LACBC's recommendation**

The RTP should measure performance by evaluating the movement of people rather than passenger cars.

### **6- Correction:**

P. 13

Paragraph titled Bicycling

"Most local jurisdictions have developed bicycle and pedestrian facilities, NMT or bicycle plans..." etc. Actually, most have NOT done adequate bicycle planning. In LA Co., only a handful of cities have Bicycle Master Plans (BMPS)). Addressing this decided lack of bicycle planning was a primary goal of Metro's current county-wide bicycle plan.

Thank you for meeting with us and for the opportunity to comment. We look forward to working closely with SCAG on any future bicycle planning efforts.

Sincerely,

Kent Strumpell  
Chair, Planning Committee  
Member of the Board of Directors, Los Angeles County Bicycle Coalition

Dorothy Le  
Planning and Policy Director, Los Angeles County Bicycle Coalition



DONALD L. WOLFE, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE

REFER TO FILE: PD-1

February 19, 2008

Mr. Hassan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12th floor  
Los Angeles, CA 90017

Attention Ms. Jessica Meaney

Dear Mr. Ikhata:

### **SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS 2008 DRAFT REGIONAL TRANSPORTATION PLAN**

We would like to commend the Southern California Association of Governments (SCAG) for its efforts in preparing the 2008 Draft Regional Transportation Plan (RTP). We have reviewed the draft plan and have the following comments.

- The Los Angeles County Metropolitan Transportation Authority (Metro) is responsible for transportation planning and programming of Federal and State transportation funds for the Los Angeles County region. Since the local agencies, including the County of Los Angeles, work directly with Metro in the development of the Metro's Long Range Transportation Plan (LRTP) to reflect local transportation needs, it is vital that the RTP be consistent with the LRTP. We strongly support the inclusion of the Metro's adopted priorities such as additional High Occupancy Vehicle lanes, the I-710 Gap Closure project, and the High Desert Corridor project as part of the fiscally constrained portion of the RTP.
- SCAG is forecasting funding shortfalls over the period of the RTP. We agree that the funds necessary to implement the projects listed in the RTP should come from both the public and private sectors. We urge that proactive and collaborative steps be taken by the region under SCAG's leadership to resolve the funding shortfall through means defined in the report.

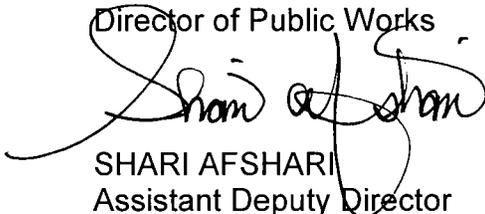
Mr. Hassan Ikhara  
February 19, 2008  
Page 2

- The most recent statewide survey of city and county needs for the local system was from a report done in 1999. This report found an existing backlog of \$11 billion, which was estimated to increase by \$400 million a year, totaling to current deficit of approximately \$15 billion. This number only reflects the backlog for rehabilitation needs on the local system and does not include safety, maintenance, operation and critical nonpavement needs such as sidewalks, traffic signs and other infrastructure critical to the safety of the public. The RTP indicates that \$40 billion is needed for the system preservation through 2035 while addressing only 20 percent (\$8 billion) of preservation needs. We believe that as our roads and streets continue to deteriorate due to the funding shortfalls, the costs to repair will escalate astronomically in the future years. The poor condition of roads is not only a safety hazard but will cost thousands of dollars per resident in terms of the lost time and extra fuel used. As we expand our system to relieve congestion and improve air quality, we must realize that it is equally or more important to maintain and preserve our aging infrastructure. Therefore, we recommend that SCAG designate the perseveration of local streets and roads as a top priority in the RTP and dedicate revenues for this purpose.
- We are very supportive of the recommendation to maximize the use of our existing transportation system. In particular, we are encouraged by the recommendation to significantly increase funding for arterial improvements and capacity enhancements. It must be noted, however, that a commitment to operate and maintain our existing transportation system is necessary to maximize the return on these investments. Therefore, the RTP should emphasize the need to provide resources for the operation and maintenance of our existing transportation system. In addition, the focus on intelligent transportation system strategies should include a recommendation to expand these strategies to improve goods movement.

If you have any questions, please contact Mr. Maged El-Rabaa at (626) 458-3943.

Very truly yours,

DONALD L. WOLFE  
Director of Public Works



SHARI AFSHARI  
Assistant Deputy Director  
Programs Development Division

WAR:pr

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Los Angeles County  
Department of Regional Planning

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*Planning for the Challenges Ahead*



Bruce W. McClendon FAICP  
Director of Planning

February 19, 2008

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

Re: **County of Los Angeles Department of Regional Planning (DRP) Response to the Southern California Association of Governments (SCAG) Draft 2008 Regional Transportation Plan (RTP), *Making the Connections***

Dear Ms. Meaney:

Thank you for the opportunity to review and respond to the SCAG Draft 2008 Regional Transportation Plan, *Making the Connections*. As the regulating agency for land use in unincorporated Los Angeles County, DRP seeks solutions to transportation and air quality issues through proactive land use management. Through its land use planning DRP strives for coordinated uses that balance local communities' quality of life, open space preservation, and region-wide mobility with commercial vitality and sustainable air quality.

Land use strategies are best implemented through locally coordinated planning efforts among land use and transportation planning agencies, which *Making the Connections* advocates. The Policy Growth Alternative, the basis of *Making the Connections*, which stresses coordination in land use and transportation decision-making, offers strategies for land preservation and mobility that are complementary with the County's Draft General Plan, *Planning for Tomorrow's Great Places*.

The regulation of land use in unincorporated Los Angeles County is conducted by DRP with great care and consideration of transportation and air quality implications and it recognizes the need for close cooperation with transportation planning agencies. The following comments on *Making the Connections* offered by DRP continue its commitment to collaboration with planning agencies to achieve regionally significant land use and transportation coordination.

### **Growth Projections**

DRP participated in the Integrated Growth Forecasting process initiated by SCAG following its release of the 2004 RTP and is generally satisfied with the total county population, household and employment projections presented in *Making the Connections*. However, DRP suggests that SCAG more closely consider locally specific data provided by DRP and city jurisdictions to better reflect local conditions and needs. Attention to these data will help *Making the Connections* assure that transportation investments are compatible with local infrastructure capacity, housing requirements, and economic forecasts.

## **Plan Strategies**

The emphasis of *Making the Connections* on providing solutions to mobility, population growth, open space preservation, and air quality through coordinated land use and transportation strategies align squarely with the goals and policies of the Los Angeles County Draft General Plan. DRP agrees that the Policy Growth Alternative is a sound foundation for maximizing mobility and achieving air quality conformance. DRP concurs that attention should be paid to in-fill; growth along transit corridors and nodes; jobs/housing balance; accommodation of housing needs due to demographic shift; and preservation of open space. Furthermore, the policies derived from the Compass Blueprint Growth Vision which inform the Policy Growth Vision are a clear guide for influencing sustainable development.

However, though *Making the Connections* advocates a multi-modal approach, there is more emphasis on support and expansion of the highway system and less on transit—a key component of smart growth and a sustainable transportation system. While it is true that making the existing transportation system as efficient as possible can lead to improved mobility and air quality attainment as the Plan 2035 scenario reports on performance measures, reliance on increasing roadway capacity as a primary strategy does little to fundamentally change how mobility is conceptualized. Greater attention to and funding of other approaches (e.g. demand management, pedestrian and bicycle plans, ridesharing) to improving mobility and improving air quality could over time create a system that is far more sustainable and capable of meeting the requirements of AB 32.

*Making the Connections* clearly strives to find innovative solutions to address the conflicting needs of improving mobility while at the same time improving air quality. Lessons from the vanguard of transportation and land use planning are advocated, such as mixed use along corridors, HOV and HOT, but they require sufficient funding for full implementation that benefits everyone in the region. DRP supports mixed use, which is a key component of its Draft General Plan. While DRP is looking toward less reliance on the automobile through mixed use, those situations where automobile use is required the HOV and HOT strategies of *Making the Connections* are certainly worthwhile—if adequately funded.

DRP is supportive of establishing an inland port in north Los Angeles County and the 2008 RTP proposal for a HOT lane along the high desert corridor would facilitate access to such a port. However, this HOT land should be primarily for goods movement and directly in relationship to an inland port and not as a means for inducing substantial local growth. Furthermore, discussion of the High-Speed Regional Transport (HSRT) system in the 2008 RTP should include an inland port in north Los Angeles County. Such a port, supported by the efficiencies that HSRT could provide, would contribute substantially to the goods movement requirements of the entire SCAG region as it positions itself for economic vitality over the next twenty years. Specifically, DRP recommends that the freight portion of the HSRT be extended beyond Union Station north to Palmdale Airport via the Burbank Airport for an inland port in north Los Angeles County.

## **Conclusion**

Although DRP does not directly make transportation system decisions, its regulation of land uses plays a major role in affecting the transportation planning and programming decisions of cities, Caltrans, Metro, and SCAG. DRP maintains a position of active collaboration with public and private stakeholders and

land use and transportation planning agencies to establish and maintain land uses that balance development with open space protection. The Los Angeles County Draft General Plan has policies to encourage greater mobility for people and commerce. These policies are implemented through land use strategies that favor in-fill and transit-oriented development. These strategies clearly mirror those of the Policy Growth Alternative of *Making the Connections*.

Fully meeting the goals of *Making the Connections* is contingent on securing the funding for infrastructure enhancements and system management and operations. Additionally, to ensure that the 2008 RTP is robust enough to handle the challenges of AB 32, SCAG must consider more fully additional measures to mitigate the global greenhouse emissions that the system generates. Even the best mobility and air quality performance outcomes of the Policy Growth Alternative will not likely adequately address the requirements of AB 32. Climate change has been raised to a new level of concern and all plans in California must deal with it.

DRP feels that SCAG has developed a well documented and thorough RTP that can provide many solutions for mobility and air quality. By providing more focus on strategies such as greater and more diverse transit; pedestrian and bicycle plans; and including an inland port in north Los Angeles County, SCAG could take even greater steps forward improving the entire region's quality of life, economic vitality, and reduction of global greenhouse gases.

If you should have any questions or comments please contact me at (213) 974-6427 or [mherwick@planning.lacounty.gov](mailto:mherwick@planning.lacounty.gov). Our offices are open Monday through Thursday from 7 a.m. to 6 p.m.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING  
Bruce W. McClendon, FAICP  
Director of Planning



Mark Herwick, AICP  
General Plan Development

MSH

c: Asoka Herath, City of Palmdale  
Brian Ludicke, City of Lancaster  
Paul Brotzman, City of Santa Clarita

DETRICH B. ALLEN  
GENERAL MANAGER  
200 N. SPRING ST.  
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ANTONIO R. VILLARAIGOSA  
MAYOR

MISTY SANFORD  
PRESIDENT  
ALINA BOKDE  
VICE-PRESIDENT  
MARIA ARMOUDIAN  
JOYCE M. PERKINS  
M. TERESA VILLEGAS

February 15, 2008

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear Mr. Ikhata:

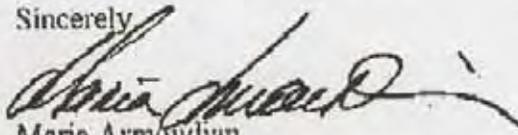
The Environmental Affairs Commission at their meeting on January 31, 2008, adopted the following comments for submission to the Southern California Association of Governments on the draft of the 2008 Regional Transportation Plan.

- 1) Thank you for addressing the Southern California Regional Transportation system. As you have noted, the projected population shifts, growth in the goods movement and demand in air travel will likely exasperate an already taxed region's ability to move. Further, we are grateful that you have included in your report the health impacts of our transportation system, which are responsible for 5400 premature deaths annually. It might also be useful to emphasize the transportation sector's greenhouse gas emissions to the region.
- 2) The EAC think SCAG is right in suggesting a multi-modal transportation that maximizes mobility and accessibility while ensuring safety, security and reliability and protecting the environment. We would also like to ensure the inclusion of the goal to protect public health.
- 3) We think the plan has important components. We are pleased about the additional rapid bus plan, the decentralization of airports and the high-speed rail. But we would like to see a more ambitious plan in order to meet the demand and the goals of the region.
  - a. Include Bus-only lanes.
  - b. Please revisit the 405 corridor, as it warrants further consideration.
  - c. Please consider including additional "express" routing that is patterned after successful bus plans such as the Flyaway.
  - d. Please explore the possibility of using exiting Cal-Trans right-of-ways along freeways and other such locations to build additional transit lines such as light rail, monorail or bus-only lanes.

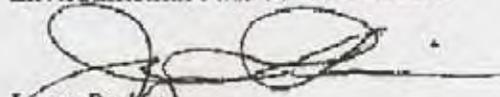


- e. Please consider proposing moratoriums across the region on street widening and expansions and instead invest those funds into improving transit.
  - f. A number of cities have used innovative methods for creating better transit. Perhaps it is useful to explore some of these plans. Some cities that have been noted in the transportation literature include Portland, Oregon; Toronto, Canada; Curitiba, Brazil; Zurich, Switzerland and Copenhagen, Denmark; Surabaya, Indonesia.
- 4) We recognize that Los Angeles has a "car culture" and that some simple, additional components need to be included in any plan in order to entice people from their cars:
- a. Park and rides – While there are many deterrents for using existing transit, one ostensible deterrent appears to be inadequate hubs where people can leave their autos near buses, subways or other transit options.
  - b. Additional incentives, such as "ride-for-free" days and other means of reducing the prices of transit (including lobbying for tax incentives).
  - c. Promoting increased telecommuting.
  - d. Create incentives for large employers that successfully implement programs that reduce auto-use (via transit, flex-cars, telecommuting or other means).

Sincerely



Maria Armoudian  
Environmental Affairs Commission

  
Joyce Perkin  
Environmental Affairs Commission

# CITY OF LOS ANGELES

CALIFORNIA

RITA L. ROBINSON  
GENERAL MANAGER



DEPARTMENT OF TRANSPORTATION

100 S. Main St., 10<sup>th</sup> Floor  
LOS ANGELES, CA 90012  
(213) 972-4949  
FAX (213) 972-4910

ANTONIO R. VILLARAIGOSA  
MAYOR

February 15, 2008

Hasan Ikhata, Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

Dear Mr. Ikhata:

The City of Los Angeles appreciates the opportunity to review and comment on the Southern California Association of Governments' (SCAG) Draft 2008 Regional Transportation Plan (RTP). SCAG is to be commended for a multi-year effort to develop the 2008 RTP, including an extensive outreach effort. The City believes that the RTP provides a very good discussion of the region's challenges, and offers an ambitious plan to meet those challenges.

After careful review of the RTP, the City has identified some areas of concern in which the RTP may not be consistent with City policy and interests, and certain areas in which the RTP could be improved. The Los Angeles Department of Transportation (LADOT) has prepared the attached report to the City Council that includes comments on the Draft 2008 RTP by LADOT, as well as comments from other City departments. The Los Angeles City Council, on February 13, 2008, adopted the attached resolution approving the attached report as the City's comments on the Draft 2008 RTP.

We look forward to working with SCAG staff to substantially incorporate into the 2008 RTP those elements of the City's comments that are directed to the content of the 2008 RTP. After review of the attached comments, please contact Jay Kim or Miles Mitchell of my staff for further discussions regarding the City's comments. We look forward to a continued mutually beneficial collaboration between the City and SCAG as we address future regional challenges and opportunities.

Sincerely,

  
Rita L. Robinson  
General Manager

Attachments

City Resolution adopted February 13, 2008  
Report to City Council on the Draft 2008 RTP, dated January 30, 2008

## RESOLUTION

**WHEREAS**, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state, or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor; and

**WHEREAS**, as the designated Metropolitan Planning Organization (MPO) for six counties in Southern California, the Southern California Association of Governments (SCAG), is mandated by the federal government to prepare a Regional Transportation Plan (RTP) every four years to address the region's transportation needs; and

**WHEREAS**, the RTP represents the collective vision of the six counties in the SCAG region and provides a framework for the future development of a multi-modal regional transportation system. The RTP must have a planning horizon of at least 20 years and it must be developed through a collaborative, comprehensive and continuous process. The projects addressing these needs are identified in the RTP and become eligible for state and federal funding; and

**WHEREAS**, the last RTP was adopted in April 2004 and SCAG released the draft 2008 RTP in December 2007 with a 45-day review period; and

**WHEREAS**, the City has prepared comments on the RTP to ensure that appropriate projects and priorities are included in the RTP, and the City's Department of Transportation (LADOT) took the lead in coordinating with affected City Departments (Los Angeles World Airports; City Planning; Port of Los Angeles; and the Environmental Affairs Department) on the preparation of comments on SCAG's draft 2008 RTP, including the identification of any issues associated with potential conflicts between the RTP and Metro's 2008 Long Range Transportation Plan (LRTP); and

**WHEREAS**, the City's comments highlights the following four policy concerns, as well as specific corrections/additions to the RTP documents and project lists: Degree of Project Readiness; High Speed Regional Transport; Conformity with the Clean Air; and Policy Growth Forecast; and

**WHEREAS**, the City's comments also identify issues on the RTP consistency with Metro's LRTP; and

**NOW, THEREFORE, BE IT RESOLVED**, with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby includes in its 2007-08 State Legislative Program ADOPTION of the attached comments contained in the LADOT January 30, 2008 report, as the City's comments to SCAG on the 2008 draft RTP, and authorize the General Manager of LADOT to transmit comments to SCAG that are substantially consistent with those contained in the LADOT's report, including the attached comments submitted by other City departments, and

**BE IT FURTHER RESOLVED**, that SCAG be requested to further evaluate the needs and priorities of local neighborhoods by prioritizing local transit markets that could include local circulators; improved bikeways; and enhanced Transit Oriented Districts (TODs), consistent with the City's transit needs assessment selection process.

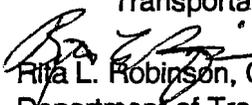
**PRESENTED BY** \_\_\_\_\_

**SECONDED BY** \_\_\_\_\_

**CITY OF LOS ANGELES**  
**INTER-DEPARTMENTAL CORRESPONDENCE**

Date: January 30, 2008

To: City Council  
c/o City Clerk, Room 395  
Attn: Honorable Wendy Greuel, Chair  
Transportation Committee

From:   
Rifa L. Robinson, General Manager  
Department of Transportation

RE: DRAFT 2008 REGIONAL TRANSPORTATION PLAN - CF 06-0413-S2

**RECOMMENDATION**

- 1) APPROVE the comments provided in this report as the City's comments to SCAG on the 2008 Regional Transportation Plan (RTP). Following the submittal of these comments to SCAG, LADOT will continue to collaborate with SCAG in an effort to have the City's comments substantially incorporated into the RTP.
  
- 2) AUTHORIZE the General Manager of LADOT to transmit comments to SCAG that are substantially consistent with those contained in this report, including the attached comments submitted by other departments.

**SUMMARY**

By Council motion (CF 06-0413-S2), the Council directed that the Los Angeles Department of Transportation (LADOT) prepare and present comments on the Southern California Association of Government's (SCAG) Draft 2008 Regional Transportation Plan, including the identification of any issues associated with potential conflicts between the statutorily mandated June 2008 submission date of the RTP and the adoption by the Los Angeles County Metropolitan Transportation Authority (Metro) of the 2008 Long Range Transportation Plan. SCAG, as the Metropolitan Planning Organization for the region, is required to prepare a Regional Transportation Plan every four years. SCAG released the draft RTP in December 2007, and is accepting comments through February 19, 2008.

Pursuant to this Council motion, LADOT has reviewed the RTP and compiled proposed comments to SCAG. In addition, LADOT, with the assistance of the Chief Legislative Analyst office, has coordinated the preparation of RTP comments by other City departments that are directly impacted by the RTP. LADOT very much appreciates the cooperation of the following City departments that have provided comments to the draft RTP: Los Angeles World Airports, City Planning, Port of Los Angeles, and the Environmental Affairs Department. Selected highlights of comments from other City departments are summarized in this report, with the comments in their entirety provided as attachments.

SCAG is to be commended for a multi-year effort to develop the 2008 RTP, including an extensive outreach effort. The RTP provides a very good discussion of the region's transportation challenges and offers an ambitious plan to meet those challenges. However, LADOT has identified areas of

concern in which the RTP may not be consistent with City policy and interests and certain areas in which the RTP could be improved.

LADOT comments to the RTP are generally organized into two areas: 1) Policy comments and concerns; and 2) Specific corrections/additions to the RTP documents and project lists, which are provided as attachments to the report.

### **DISCUSSION OF POLICY CONCERNS AND COMMENTS**

LADOT has concerns and comments in the following areas:

#### **Degree of Readiness of Projects Included in RTP**

As stated in the Project Listing appendix to the RTP, the RTP projects are divided into three broad categories. The first category is the adopted 2006 Regional Transportation Improvement Program, known as "RTIP Projects," and represents those projects with the highest level of committed funding. The second category, known as "Financially Constrained RTP Projects," contains an "additional financially constrained set of transportation projects above and beyond the RTIP," with funding commitments not as definite as RTIP projects. The third category, known as "Strategic Plan Projects" represents an "unconstrained illustrative list of potential projects" that the region would pursue if additional funding and consensus were obtained.

SCAG is to be commended for conducting numerous public RTP workshops during the last six months of 2007. One of the major topics of discussion at the workshops was whether certain very costly projects should be in the RTP or the Strategic Plan. Many of these projects have supporters, but have not yet secured full funding commitments and broad consensus support. However, at the end of the process, many of these projects were included in the RTP because if they were not in the RTP they would not be eligible for federal funding (engineering, environmental and construction funding). The projects have been included in the RTP because they have "reasonably available funding": a very broad funding definition which federal regulations allow for RTP inclusion, but which may not be at the level of committed funding.

The result is that the Financially Constrained RTP Projects contains many projects that, in the view of LADOT, require further review. LADOT understands and supports the inclusion of these projects in the RTP because such inclusion allows for eligibility for additional federal funding. However, the fact that the projects are in the RTP does not mean that the merit of the projects has, in all cases, been substantiated. Some of the projects deserve further review and evaluation, particularly given their enormous costs. In particular, the various High Speed Regional Transport (HSRT) projects, with a total projected cost of \$75 billion, require further review. These projects will be discussed in more detail in the following section.

#### **Recommendation:**

The key point is that the City's support for the 2008 RTP should not be taken as support for the implementation of all of the projects included in the RTP. Many of these projects are included in the RTP in order to be eligible for additional federal funding, but will nevertheless require further review and study before the decision to construct and implement.

High Speed Regional Transport (HSRT)

The RTP includes extensive discussion of a proposed High Speed Regional Transport system, including both cargo and passenger service. The HSRT revenue plan relies upon three core components: 1) Goods Movement – cargo containers would be transported from the San Pedro Bay ports to an “inland port facility”; 2) Aviation Plan – airport passengers would utilize high speed rail service between airports and urban centers; and 3) Passenger Service – providing high speed passenger service between urban activity centers. (Please see comments from Los Angeles World Airports and the Port of Los Angeles.) The following HSRT projects are included in the RTP.

<u>Project</u>	<u>Estimated Cost</u> <u>(billions)</u>
• Initial Operating Segment (IOS) – Ontario – West Covina – LA Union Station – West LA/LAX (cargo and passenger – technology to be determined)	\$19
• IOS extension to San Bernardino (cargo and passenger – technology to be determined)	\$3.5
• San Pedro Ports to the IOS (cargo only)	\$18
• Anaheim – Ontario Maglev Segment (part of the proposed California-Nevada Maglev project)	\$6.7
• California High-Speed Train (Union Station to Anaheim) (steel-wheel on steel-rail)	\$4.0
• Orangeline High-Speed Transit (Orange County - Union Station – Palmdale) (Maglev)	\$23.6
<b>Total</b>	<b>\$74.8 billion</b>

Several of these projects are the subject of current transportation studies that are in process. On-going studies for HSRT projects include the following:

1) Initial Operating Segment (IOS) project from West Los Angeles to Ontario – This project is currently the subject of an Alternatives Analysis study, being conducted by Cambridge Systematics. The purpose of the study is to identify a “preferred regional high-speed ground transportation project” for the IOS. The study is evaluating key issues including comparing alternative alignments, maglev and steel-wheel technologies, and station spacing alternatives. In addition, the study is reviewing ridership, capital and operating costs, and financing approaches for both Maglev and steel-wheel technologies for the IOS.

2) Goods Movement from the Ports of Los Angeles and Long Beach - Currently an Environmental Impact Report is in process for this corridor. The I-710 Corridor EIS/EIR is being coordinated by the Gateway Cities Council of Governments and is reviewing major alternatives for transporting goods along the 710 Freeway Corridor. The study will take three to four years to complete.

3) Advanced Cargo Transportation Technology Evaluation and Comparison – Cambridge Systematics has been retained to compare various technologies for goods movement within the Ports of Los Angeles and Long Beach. The goal is to identify goods movement conveyance technologies that are both non-polluting and will allow the Ports to continue to grow and remain competitive in world markets.

Recommendations:

- The findings of these, and possibly additional studies, will provide vital information with regard to the preferred approach to high-speed rail systems, both for cargo and passengers. LADOT recommends that both the City and SCAG wait until these studies have been completed before proceeding to implement HSRT projects.
- While in the past (2004 RTP) HSRT project(s) were characterized as being privately funded, the 2008 RTP describes these as being “largely self-financed” and that “some level of financial commitment from the public sector” is a “critical component.” However, SCAG should be advised that neither the City nor Metro has made any commitment of present or future “traditional” transportation/transit funds to HSRT.
- The 2008 RTP Aviation Plan relies heavily on HSRT to decentralize aviation demand and to shift aviation demand away from LAX to Ontario and Palmdale airports. For example, the 2008 RTP states that HSRT is an “integral component of the....preferred 2035 regional aviation demand forecast.” Because of the City’s concerns with HSRT, as described above, the City must reserve judgment on the Aviation Plan at this time. (Please also see attached comments from Los Angeles World Airports.)

Conformity with the Clean Air Act

One of the main objectives of the RTP is to develop a transportation plan that is in “conformity” with the requirements of the federal Clean Air Act. Essentially, conformity is reached if transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of relevant air quality standards. A “conformity finding” is necessary in order for the region to be eligible for most federal transportation funds.

SCAG has indicated that the 2008 RTP will meet conformity with the Clean Air Act. However, the air quality modeling used to make this finding includes projects from both the RTIP and Financially Constrained RTP Projects lists. As described above, the RTIP projects have virtually guaranteed funding, whereas the Financially Constrained RTP projects have a probability of being implemented, but, in many cases, have not yet secured full funding commitments and broad consensus support.

Recommendations:

- The City believes it would be useful for SCAG to determine how close to conformity the RTP would be if only RTIP projects were used to reach conformity. If there was a finding that the RTIP projects alone do achieve conformity, then the region would be able to evaluate other projects based upon their transportation and air quality improvement merits without the “pressure” of including these projects in the RTP because of the possibility that they were required for conformity. This would facilitate a more objective cost/benefit analysis of the non-RTIP projects, including HSRT. If it was determined that the RTIP projects alone did not meet conformity, then the region could choose which of the non-RTIP projects to add because there would be a better idea of how much additional emissions reductions were needed to meet conformity. The attached comments from the Environmental Affairs Dept.

provide a similar recommendation.

- The City believes that the HSRT projects should not be used in the modeling for air quality conformity. Although the HSRT projects may have “reasonably available funding,” a broad definition that allows inclusion in the RTP, in most cases the funding for HSRT projects could not be described as a “firm commitment.” Accordingly, the HSRT projects may not proceed as planned. Therefore, air quality conformity should not rely on HSRT projects. It should be noted that SCAG, in informal discussions with City staff, has indicated that they do not believe that the HSRT projects are necessary for air quality conformity.

### Policy Growth Forecast

As in the 2004 RTP, the 2008 RTP proposes the integration of land use and transportation planning. The City, with strong support from the Planning Department., commends SCAG on this ambitious “growth visioning” effort. As described in the 2008 RTP, by including major elements of “smart growth” planning, the RTP succeeds in reducing the growth rate of congestion and Vehicle Miles Traveled (VMT) for the region. This effort by SCAG is broadly known as the “Compass Blueprint Growth Vision” and has been widely discussed throughout the region.

During a series of planning workshops conducted by SCAG in 2005 and 2006, the region supported increased smart growth planning with the result that a revised growth forecast for the region was developed. This forecast, which contains many Compass and smart growth elements such as increased density around transit and employment centers, is known as the Baseline Growth Forecast in the 2008 RTP. However, in the summer of 2007, in an effort to more aggressively implement the Compass plan, SCAG developed a new growth forecast known as the Policy Growth Forecast, which is the primary growth forecast of the Draft 2008 RTP. Please also see attached comments from the City Planning Department.

The City has a several concerns with the Policy Growth Forecast, which are as follows:

- The Policy Forecast, as compared with the Baseline Forecast, would shift an additional 250,000 people into Los Angeles County by 2035, mostly from inland counties such as Riverside and San Bernardino. It is reasonable to assume that most of these 250,000 people would have to reside in the City of Los Angeles, because it is by far the largest city in Los Angeles County. However, the City’s Planning Department has not approved the Policy Forecast. As stated in the memo from the Planning Department attached to this report, it is “infeasible to fully assess the potential impact of this growth on the City’s infrastructure and services within the timeframe of the RTP comment period.” The comments from the Environmental Affairs Department include a recommendation that “SCAG must be sure to consult with the local governments that have land use authority.”
- As indicated in the memo from the Planning Department, the data provided in both the RTP and the RTP Environmental Impact Report (EIR) are “not sufficiently detailed to evaluate the extent to which individual community plans (of the City) would meet the requirement of being consistent with the RTP.” There is a concern that the Policy Forecast may be inconsistent with adopted City land use plans.
- Although the Policy Forecast shifts population to the coastal counties (Orange and Los Angeles), it provides no corresponding increase in transportation funding to provide for the increased transportation needs of the additional population, jobs and housing. The City believes that, if the Policy Forecast is adopted, additional funding should be provided to

accompany the additional population as is consistent with the true integration of land use and transportation planning.

- Despite being assured by SCAG staff in many RTP workshops that the Policy Forecast was “advisory” and “voluntary,” the 2008 RTP does not adequately indicate in writing that the Policy Forecast is advisory or voluntary. Moreover, the draft 2008 RTP documents give the impression that the region has agreed to the Policy Forecast and it is therefore included in the 2008 RTP for adoption.
- SCAG has used the Policy Forecast in its air quality conformity determination, such that conformity relies on implementation of the Policy Forecast. Yet the Policy Forecast has not been approved by a majority of jurisdictions in the region and may not therefore be implemented. In fact, concerns have been raised, including from cities in Orange and San Bernardino Counties, about whether the Policy Forecast represents an acceptable and feasible growth forecast. For example, Orange County has asked that the Policy Forecast be modified to reflect Orange County growth projections. There are also indications that the Policy Forecast does not, in some cases, accurately reflect already approved developments in Orange and San Bernardino Counties.

#### Recommendation:

The City believes that the 2008 RTP should utilize the Baseline Growth Forecast, which has been generally approved by the City and throughout the region and that it should be clearly stated that Policy Forecast is advisory and voluntary.

It should be noted that SCAG, in response to concerns raised from several subregions about the Policy Growth Forecast, has agreed to reconsider which forecast will be used in the RTP. At the March 2008 SCAG Policy Committee meetings, there will be a discussion of whether to use the Baseline or the Policy Growth Forecast in the RTP. SCAG has also confirmed that it appears likely that air quality conformity would be achieved using the Baseline Growth Forecast.

#### Metro Long Range Transportation Plan

The Metropolitan Transportation Authority (Metro) is in the process of preparing an update to its Long Range Transportation Plan (LRTP). The City is in the process of providing comments to Metro on the draft LRTP. Following approval of the LRTP by the Metro Board, the LRTP projects and priorities will be transmitted to SCAG for inclusion in the RTP. LRTP projects must be included in the RTP in order to be eligible for federal funds. However, since it is anticipated that the LRTP will not be finalized until Summer 2008, and the RTP will be adopted by the SCAG Regional Council in April 2008, the RTP will have to be amended to incorporate the updated LRTP.

The RTP includes a \$569 billion transportation program for the six-county area through 2035. The \$569 billion in revenue to fund this program is composed of \$413 billion in traditional revenue sources and \$156 billion from revenue increases or innovative financing strategies. Metro has indicated a concern that the RTP not assume new revenue from traditional funding sources relied upon by Metro. In the attached comments on the RTP by Metro, the projected RTP revenue is summarized as follows:

“One of the most significant differences between the draft 2008 RTP and our adopted 2001 Long Range Transportation Plan (LRTP), is that many new transportation projects have been proposed in the RTP for Los Angeles County that are beyond revenues that we assume to be available from traditional sources. SCAG is assuming that these projects are funded with a

combination of traditional funding, innovative funding (e.g. container fees and public private partnerships), revenue increases (e.g. SCAG is assuming a 10 cent increase in the state gas tax and a 10 cent increase in the federal gas tax), and traditional funds between 2030 and 2035 that have no Board commitments.”

#### Recommendations:

- Upon completion of the LRTP, if there is a conflict between the projects or project schedules of the LRTP and the RTP, the City and Metro should request that the RTP be amended to incorporate any necessary changes. As indicated in the attached draft comments to the RTP by Metro, this is the approach recommended by Metro.
- Support Metro’s effort to determine if the RTP financial projections assume new revenues from sources traditionally relied upon by Metro and seek to reconcile the financial projections of the LRTP and the RTP.

#### Highlights of Comments from Other City Departments

LADOT appreciates the cooperation of other City departments in providing comments to the RTP. These comments in their entirety are attached to this report. Selected highlights of these comments are as follows:

##### Los Angeles World Airports (LAWA)

- While supporting the goal of aviation decentralization (from LAX to regional airports), LAWA cautions that it is “limited in the types of incentives that can be provided to airlines to attract new service. It also cannot be assumed that funds generated at LAX can be made available to attract service other airports.”
- Regarding the Policy Growth Forecast LAWA is concerned that it “may have overlooked transportation projects that will be necessary to support land use patterns as the cities and counties general and specific plans now envision.”
- LAWA provides several comments on the proposed High Speed Regional Transport (HSRT) system. LAWA indicates that it “does not agree that it is necessary for a High Speed Rail System to connect airports in order to decentralize the airport system. A rail or transit system that connects population centers to airports would serve the airports as well or better.” LAWA also questions the RTP’s projection of increased use of San Bernardino Airport as follows: “The conclusion is therefore that 6 Million Annual Passengers will be driven by capacity limitations at ONT and LAX to bypass both airports along the same HSRT route to use San Bernardino International for air travel. While it is clear how the model would assign passengers in this manner, are the results truly indicative of how passengers will choose airports in the future?”
- Regarding airport funding of Ground Access Improvements, LAWA is concerned by the suggestion in the RTP that airports have a responsibility to fund regional transportation improvements (including HSRT). LAWA states as follows: “Although LAWA supports change (to current restrictions on the use of airport funds) that would allow flexibility to use airport revenues for projects in the surrounding communities, it has to be recognized that, except for the highways and arterials directly serving the airport, ground access to airports and other primary transportation facilities is a regional issue.”
- The RTP includes discussion of developing a regional system of FlyAways to serve Ontario and Palmdale Airports. Although LAWA is carefully studying ways to expand the Flyaway Program, such expansion will require further analysis and review.
- LAWA provides corrections and comments to the cargo and passenger activity levels at LAX, Ontario and Palmdale.

City Planning Department (DCP)

- The Planning Dept. indicates that “the data provided in both the RTP and Program Environmental Impact Report (PEIR) are not sufficiently detailed to evaluate the extent to which individual community plans (of the City) would meet the requirement of being consistent with the RTP. Furthermore, SCAG has not yet developed a methodology to perform consistency analysis of local general plans with the RTP.”
- City Planning indicates that more time will be required to fully assess the potential impact of the Policy Growth Forecast on the City’s infrastructure and services.

Port of Los Angeles (POLA)

- The RTP projects new container fees to fund approximately \$42 billion worth of goods movement related highway and freight rail projects. POLA provides a number of important clarifications with regard to this revenue projection and how the fees would be utilized.
- Regarding the proposed HSRT system, POLA comments that implementation of HSRT should follow completion of the Ports technology study and I-710 Corridor EIS/EIR (please see comments under HSRT section of this report). POLA also comments that the “HSRT system is not needed to accommodate the projected Ports Year 2030 throughput of 42.5 million TEU’s, which has been incorporated into the RTP baseline.”
- As mentioned in the HSRT section of this report, Goods Movement is one of the three elements of the proposed HSRT system. The concept is that cargo containers would be transported from the San Pedro Bay ports to an “inland port facility” by high speed transport. POLA recommends further study regarding the inland port concept. In addition, POLA indicates that “inland ports/facilities are not needed to accommodate the projected Ports Year 2030 throughput of 42.5 million TEU’s.”

Environmental Affairs Department (EAD)

- In May 2007, the City of Los Angeles introduced *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*, that describes over 50 actions for the City to mitigate greenhouse gas emissions. EAD would like to “ensure that the strategies in the RTP are not in conflict with the City’s proposals and programs” in this area.
- With regard to the Policy Growth Forecast, and its inherent land use changes, EAD recommends that SCAG consult with local governments (including the City) that have land use authority.
- EAD recommends that the RTP state which projects are required to be included in order to meet the Conformity tests. LADOT has a similar recommendation.
- With regard to the Program Environmental Impact Report (EIR) for the RTP, EAD asks for clarification and additional information in a number of areas, as well as recommendations regarding the EIR mitigation measures. (Please see the attached comments from EAD for detailed comments regarding the EIR.)

**FISCAL IMPACT STATEMENT**

This report contains comments regarding transportation policies and projects included in the Draft 2008 Regional Transportation Plan. The comments will not impact the City’s General Fund.

**COORDINATION**

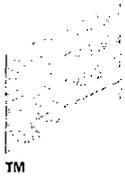
LADOT has collaborated with the Chief Legislative Analyst, the City Planning Department, Los Angeles World Airports, the Port of Los Angeles, and the Environmental Affairs Department in the preparation of this report. As projects are implemented, further coordination with the Bureaus of Engineering and Street Services on the evaluation and design of specific improvements will be necessary.

**Attachments (8)**

- Los Angeles World Airports Comments on the RTP
- Port of Los Angeles Comments
- City Planning Dept. Comments
- Environmental Affairs Dept. Comments
- Draft Comments on the RTP by Metro
- Additions to RTIP Project Lists
- Additions to RTP and Strategic Plan Project Lists
- Additional Technical Corrections to the RTP

cc: Mayor Antonio Villaraigosa  
Attn: Jaime De La Vega  
Chief Legislative Analyst  
City Planning Department  
Los Angeles World Airports  
Port of Los Angeles  
Environmental Affairs Department

JWK:MLM



TM

## Los Angeles World Airports

January 28, 2008

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 W. Sixth Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

LAX

LA/Ontario

LA/Palmdale

Van Nuys

City of Los Angeles

Antonio R. Villaraigosa  
Mayor

Board of Airport  
Commissioners

Alan I. Rothenberg  
President

Valeria C. Velasco  
Vice President

Joseph A. Aredas  
Michael A. Lawson  
Sylvia Patsaouras  
Fernando M. Torres-Gil  
Walter Zifkin

Gina Marie Lindsey  
Executive Director

Re: Comments on the Draft 2008 Regional Transportation Plan

Dear Mr. Ikhata:

Los Angeles World Airports (LAWA) has completed its review of the Draft 2008 Regional Transportation Plan (RTP). LAWA is committed to working with all levels of government to address the future transportation demands facing Southern California. As the operator of three of the region's commercial airports, Los Angeles International (LAX), Ontario International (ONT) and Palmdale Regional (PMD), LAWA plays an important role in insuring the availability of air transportation to meet the region's needs. We recognize that failure to accommodate this demand in the future will impact the economic well being of the region.

We appreciate the effort that SCAG staff has made in the development of this RTP to address how the Southern California region will meet its future regional transportation needs in the face of significant demographic and economic changes. Further we understand the need to insure coordination and cooperation at the local level to provide sufficient airport capacity to meet this region's future demand for air service.

LAWA stands ready to support implementation of the RTP to the extent that is reasonable and possible as a public airport operator and a proprietary, self-supporting department of the City of Los Angeles. Our first and foremost responsibility is to operate our airports in a safe, efficient and fiscally responsible manner on behalf of our passengers, users, tenants and the citizens of our City. Moreover, we are constrained in how we spend our airport revenues by Federal law as well as our agreements with our airline tenants. Finally, as a public-sector business entity we are impacted by business, economic, and demographic trends which shape present and future demands for air service and our ability to meet those demands. These factors are among the reasons why we have concerns and objections to elements of the draft regional transportation plans.

Nonetheless, as the primary provider of commercial air service in Southern California, we are committed to working as closely as possible with SCAG in the implementation of the RTP. A major part of this effort will be incorporated in the

planning processes that we are currently going through for LAX, Ontario and Palmdale Airports.

Our specific comments on the 2008 RTP primarily focus on those elements of the RTP that relate to the airports LAWA operates and the regional airport system as a whole. However, since assumptions regarding the distribution of regional population and employment and the need for high speed rail are so intertwined with the recommendations in the plan, we found it necessary to include comments on these topics as well.

#### Decentralization of Regional Airport Activity

LAWA supports SCAG's regional goal to decentralize airport activity. Both limitations to growth at LAX and broader regional roles for ONT and PMD have been incorporated into our planning for the LAWA airport system. However, LAWA is limited in the types of incentives that can be provided to airlines to attract new service. It also cannot be assumed that funds generated at LAX can be made available to attract service to other airports. First, federal regulations limit the use of revenues from airports with existing service towards market incentives for new service at other airports. Second, necessary facility modernization programs over the next 10 years at LAX will limit the resources available to the other airports and each airport will be expected to remain as financially independent as possible. The greatest hurdles for consumer acceptance of regional airport facilities are the cost and availability of service. Therefore, care must be shown in choosing strategies aimed at encouraging passenger growth that might burden airports with increased costs. These costs must then be passed on to airlines and airport tenants and ultimately to passengers, thereby defeating their purpose.

#### The Regional Growth Forecast

The need to integrate land use and transportation planning in our region is very clear. However, the growth forecast used in this RTP goes beyond the current commitments of the member governments to implement the land use concepts that are proposed in the plan. The visionary concepts proposed in the plan are admirable but seem premature. The concern is that in using these forecasts, the plan may have overlooked transportation projects that will be necessary to support land use patterns as the cities and counties general and specific plans now envision. This growth forecast impacts the distribution of regional passenger demand among the airports as well by assuming that population will be more concentrated within an airport's market area.

On the other hand, the policy forecast proposes denser population growth inside the urban core of the region, which is the traditional market area for LAX. This growth pattern supports a more efficient transportation system and reduces transportation

investment, but does not support the plans emphasis on decentralizing the airport system. The population living within this core area of the region and particularly within the City of Los Angeles will be the least likely to use the outlying airports.

Although the policy growth forecast is highlighted as a key feature of the RTP, it is not clear how the policy forecast contributes to the overall performance of the plan. In designing and testing the scenarios, the preferred growth forecast was paired with the preferred transportation plan while the Baseline 2035 scenario was paired with the baseline growth forecast. Put another way, the ability of the long term constrained transportation projects alone to meet the goals of the plan were not tested.

#### The Transportation Project List

RTIP Project List: RTIP Project LA0F073, "Projects within Los Angeles International Airport to Eliminate Traffic Bottlenecks" (LAWA) (Sec. 336 Funding) was added to the RTIP in Amendment #06-06. This project should be added to the Los Angeles County RTIP Project List, under Local Highway.

RTP Project List: All of the RTP HSRT projects are listed as completed in 2020. Given planning, funding, design, right-of-way and environmental clearance requirements it is unlikely that this project can be in place by 2020.

#### Regional High Speed Rail Transport (HSRT)

As in previous plans, the 2008 RTP proposes a regional high speed rail system. In this RTP, the extended Initial Operating Segment (IOS) along with a cargo component from the Ports is included as part of the Financially Constrained RTP and the remainder of the system is in the Strategic Plan. The RTP states that surface connectivity between the airports in the region is necessary to achieve the decentralization of airport activity. It envisions the airports functioning as a single airport system with multiple remote terminals. The HSRT in the plan is cited as the basis for a regional airport system and a substantial part of the justification for the HSRT is air passenger ridership. Please note the following comments regarding this element of the plan.

- LAWA does not agree that it is necessary for a High Speed Rail System to connect airports in order to decentralize the airport system. A rail or transit system that connects population centers to airports would serve the airports as well or better. The idea that connecting passengers would use high speed rail to connect to flights at different airports is attractive; however, it is more likely that airlines will continue to serve connecting passengers at the same airport, hopefully within the same terminal. It is also important to look at the role of connecting passenger traffic in this region. The primary benefit to the region of

providing connecting service is to make a broader range of air service available to the region's origin/destination passengers. In terms of economic impact to the region, connecting passengers do not remain in the region long enough and do not spend enough to impact the region's economy to the point where it is worth maintaining a high speed rail system to accommodate them. On the other hand, access to outlying airports via easy, reasonably priced, safe and accessible rail transit from the central population core would make outlying airports more attractive to residents and visitors, the primary customers we are trying to serve at our airports.

- In addition to the IOS, the plan this year includes a proposed Maglev connection between Anaheim and Ontario International Airport (ONT) as part of a larger system proposed to ultimately serve Las Vegas. The modeling for the aviation forecasts were completed before the Anaheim to ONT Maglev project was included in the RTP financially constrained projects. This proposed line may have significant potential to provide Orange County air passengers access to ONT and should be included in the RADAM modeling in the future to determine its' utility for serving Orange County air passenger demand.
- The RADAM model results which include the IOS show that ONT gains only 2.8 MAP in 2035 with the completion of the HSRT IOS, increasing from 28.8 MAP without the rail system to 31.6 MAP with it. This gain actually increases passenger demand at ONT over LAWA's estimated capacity of 30 MAP. At the same time, the HSRT substantially increases passenger demand at San Bernardino International from 3.3 MAP without HSRT to 9.4 MAP with the train. The conclusion is therefore that 6 Million Annual Passengers will be driven by capacity limitations at ONT and LAX to bypass both airports along the same HSRT route to use San Bernardino International for air travel. While it is clear how the model would assign passengers in this manner, are the results truly indicative of how passengers will choose airports in the future?

#### Airport System Funding of Ground Access Improvements

In the Aviation Guiding Principles of the RTP it is stated that the region as a whole has an obligation to help pay the costs of airport environmental mitigation and ground access improvements in counties that serve a disproportionate share of regional air travel demand at their airports. On the other hand it suggests that the airport system pay a substantial amount towards the implementation of the Maglev system. Airports have the responsibility to manage airport facilities and operations and provide efficient links between airport facilities and the ground transportation systems. The development and operation of regional transportation systems is the broad responsibility of the county and the regional transportation and transit agencies. The airports should not be responsible for funding regional transportation.

The RTP also proposes changes in the current restrictions on the use of airport funds that would allow the use of airport revenues for off-airport ground access projects. Although LAWA supports change that would allow more flexibility to use airport revenues for projects in the surrounding communities, it has to be recognized that, except for the highways and arterials directly serving the airport, ground access to airports and other primary transportation facilities is a regional issue. Substantial investment is expected in the RTP at LAX, ONT, and PMD to provide capacity and improve facilities to serve regional air service demand. That is the primary role of the airport and the priority for the use of airport revenues whatever the source must first be to fund on-airport, aviation related projects.

#### The Airport Flyaway Program

The RTP states that SCAG has been working closely with LAWA on planning and programming a regional system of FlyAways to serve ONT and PMD. In fact, the relationship between SCAG and LAWA related to this work is very new, and LAWA has only recently been consulted and advised as to SCAG's project goals and direction. At this time, no alliance or agreement has been crafted between SCAG and LAWA related to FlyAways. LAWA's focus at this time is creating service to LAX to mitigate traffic and environmental impacts created by growth in passenger demand. Service to other airports is being studied.

FlyAways are a promising solution to certain ground access problems. However, FlyAways are expensive to operate and require a substantial passenger volume, high fares or significant subsidies to maintain an effective level of service. LAWA has spent a great deal of time and resources carefully studying the feasibility of establishing new FlyAways to serve LAX. Two new locations have joined the Van Nuys FlyAway service in the last few years. However, even for LAX with its extensive market area and passenger base, it has been a challenge to find station locations that meet criteria for financial viability and in most cases LAWA recognizes that a successful service will require subsidy to keep fares low enough and service standards high enough to attract passengers. Although LAWA is studying the potential for FlyAway service to ONT, it must be recognized that this may not be the most effective use of limited funds to achieve the goal of increased passenger demand at ONT or PMD.

#### Airport Activity Forecasts

LAX: The capacity constrained forecast for LAX of 78 Million Annual Passengers (MAP) is lower than the 78.9 MAP level allowed by the LAX Master Plan. LAWA does not agree that this number reflects the runway capacity of LAX. The capacity limit for passenger activity in the LAX Master Plan is based on gate capacity. The master plan settlement agreement provides a mechanism for restricting capacity by limiting the number of contact gates available to flights. Based on airfield modeling, the

runway capacity of LAX is understood to be higher than 78 MAP. The LAX cargo forecast of 2.5 Million Annual Tons (MAT) in the RTP is also substantially lower than the level of cargo demand anticipated in the LAX Master Plan. The LAX Master Plan anticipates that LAX will serve 3.1 MAT of cargo by 2015. There is no reason to believe that level would be lower by 2035.

ONT: The RTP assumes an airfield capacity for ONT of 31.6 MAP based on assumed fleet mix and acceptable delay. It should be noted that LAWA's airfield analysis for ONT estimates airfield capacity in terms of passengers at between 28 and 30 MAP. While it is recognized that the airport can support higher levels of activity with higher levels of delay, the ONT Master Plan is being developed to serve about 30 MAP. The RTP forecasts cargo demand at ONT at 1.96 MAT in 2035. By comparison, March Inland Port is forecast to serve 1.1 MAT by 2035. LAWA has forecasted unconstrained cargo demand at ONT to be about 3.26 MAT. This forecast assumes that, out of the outlying airports, ONT will be the first choice of airlines seeking to locate cargo development to serve regional demand. Land use studies conducted as part of the development of the ONT Master Plan have shown that land availability will be a constraint to serving the unconstrained demand. Still, the ONT Master Plan forecast anticipates that ONT can support about 2.9 MAT. We predict that UPS alone will serve about 1.2 MAT by 2030 on their off-airport facility and the Pacific Gateway Cargo Complex now under development is anticipated to serve 715,000 tons of cargo by 2020. In addition to these areas, there is substantial land on the south side of the airport that can be developed for air cargo and will be reserved for cargo in the master plan. The availability of land combined with the location of the airport within the region and the strong presence of logistics services should make ONT desirable for cargo development as long as land is available.

PMD: LAWA has forecasted passenger demand at PMD to be about 1 MAP by 2030. This forecast is based on a study of the airport's traditional market area and surveys done to determine the extent of the service catchment area and propensity to travel by air in the local market. The 6.3 MAP forecast in the RTP is based on a number of assumptions that need to be supported within the growth forecast and other transportation elements of the RTP. These include:

- Improved ground access reliability: It is assumed that additional access routes will be constructed to decrease the dependence on Route 14 in providing access to PMD. The projects that are assumed should be on the constrained RTP project list and listed in the document.
- Future Trip Propensities increased: It is assumed that more high income, high tech employment will be present in the Antelope Valley. Is this assumption consistent with the employment forecast used in the RTP?
- Free shuttle service to airports and Low Cost Parking: The cost for these services needs to be considered in terms of available financial resources to support them.

### Supplemental Reports

*Aviation and Ground Access Report:* Please note the following specific comments and corrections related to information in the Aviation and Airport Ground Access Supplemental Report.

- The Airport Ground Access Element is referred to in the Aviation and Ground Access Report but it is not included in it or as an appendix. The ground access element should be included.
- On Pg 18 under Item 8. Planned facility and ground access improvements, the following corrections should be made:
  - All projects listed here should refer to projects also listed in the RTIP or RTP and use the same identification number.
  - LAX 1: Widen Sepulveda (Manchester to Lincoln). Although this roadway also serves air passengers, the primary purpose of this project is not specifically to improve airport access.
  - LAX 2/ LAX 4: Upgrade I105 Off-ramps to Sepulveda. Should be changed to "Widen westbound I105 off ramp to Northbound Sepulveda".
  - LAX 8: Light Rail or Transit on Century Blvd. Is this referring to the extension of the Green Line to the north? This project is not under construction.
  - LAX 12: No Left Turn Lanes on Aviation/Airport. This project is not planned, programmed or under construction.
  - "New Projects" should be changed to "Planned Projects"
  - LAX 28: Grade Separation on Douglas. This is a City of El Segundo project that is unrelated to LAX ground access.
  - LAX 29: Additional Left Turn Lanes on La Cienega at Centinela: This is a City of Los Angeles Project that is not related to LAX ground access.
  - Delete Tentative Plans bullet
  - LAX 20/21 Lincoln Blvd: No Project description here. There is some construction on Lincoln at this time.
  - LAX 23: I-10 HOV Lanes (SR90-I105): Change to I-405 HOV lanes and add to Under Construction portion of the list.
  - LAX 9: Century to Sepulveda: No project description.
  - LAX 17/26: Downgrade by the City of L.A.: No project description.
  - Please add to Planned Projects list: Widening of Aviation Blvd. between 111<sup>th</sup> and Imperial Hwy.
- On Pg. 19 under Item 9: The Tom Bradley International Terminal (TBIT) airside and landside improvements described are not part of the LAX Master Plan. The Flyaway program is no longer planned to provide exclusive access to the internal CTA curb front.

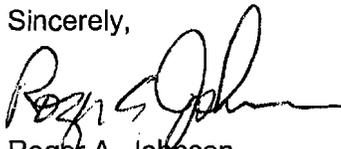
Mr. Hasan Ikhata  
January 28, 2008  
Page 8 of 8

- On Pg. 22 under Item 8: Reference should be made only to planned and programmed projects that are in the RTIP or proposed in the RTP.
- Pg. 25 LAWA will be deferring environmental documentation for the PMD Master Plan until projects described in the draft master plan are closer to design and construction.

*Goods Movement Report:* Page 31 of this supplemental report and also Pg. 126 of the main report shows proposed grade separation projects in San Bernardino County. Projects 1 and 17, Grove Avenue and Archibald Avenue both on the Alhambra line are completed projects. Also, on that page, the two grade separation projects at Vineyard should be distinguished in the Project Description List by the rail line they are on.

Thank you for the opportunity to review the 2008 Draft RTP. We hope that these comments will be helpful in developing a successful plan that meets the region's needs. If you have any questions regarding this information, please contact Paula McHargue, Supervising Transportation Planner at 310-646-9181 or [pmchargue@lawa.org](mailto:pmchargue@lawa.org).

Sincerely,



Roger A. Johnson  
Deputy Executive Director

RJ:PM:pm

January 29, 2008

Antonio R. Villaraigosa, Mayor  
City of Los Angeles

Board of Harbor  
Commissioners

S. David Freeman  
President

Jerilyn López Mendoza  
Vice President

Kaylynn L. Kim

Douglas P. Krause

Joseph R. Radisich

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Executive Director



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Rita Robinson  
General Manager, Los Angeles Department of Transportation (LADOT)  
100 S. Main St., 10<sup>th</sup> Floor  
Los Angeles, CA 90012

RE: Draft 2008 Regional Transportation Plan (RTP)

Dear Ms. Robinson:

The Port of Los Angeles has been collaborating with other City departments on the preparation of RTP comments for submittal to the City Council. The Port has the following comments on the *Draft 2008 Regional Transportation Plan* (December 6, 2007):

**Container Fees:** The draft 2008 RTP assumes container fees to fund approximately \$42 billion worth of goods movement related highway and freight rail projects. These fees are assumed to be State-imposed (i.e., SB 974), federally-imposed, or from Ports of Long Beach/Los Angeles (Ports) generated fees. The Ports of Long Beach/Los Angeles (Ports) approved a cargo fee on January 14, 2008 to help fund several critical, nationally significant intermodal transportation system projects that are included in the draft 2008 RTP. The projects selected to be partially funded by the Ports Infrastructure Cargo Fee (ICF) are as follows:

- Gerald Desmond Bridge Replacement (Port of Long Beach)
- SR-47 Expressway (Alameda Corridor Transportation Authority)
- Navy Way/Seaside Avenue Interchange (Port of Los Angeles)
- I-110 Connectors Program (Port of Los Angeles)
- South Wilmington Grade Separation (Port of Los Angeles)
- Ports Rail System (Ports & ACTA)

Several critical points of clarification are as follows: 1) the Ports will collect and control the fee proceeds; 2) the fee will be restricted for only the projects listed above, and not for any other project identified in the RTP; 3) the fee will be collected at a specific rate/year as follows (subject to change): \$15/loaded TEU in 2009, \$18 in 2010-2011, \$14 in 2012-2014, and \$10 in 2015. The fee will generate approximately \$1.39 billion over seven years, as compared to the \$42 billion assumed in the RTP. Industry's share, estimated to be approximately 47% in aggregate for all of the ICF projects, was computed based upon a detailed nexus analysis and an assumed amount of non-Ports, public funds. The nexus analysis determined the pro-rata share of Ports vehicular and train volumes for all of the designated projects.

Additionally, while it is difficult to predict the outcome of SB 974, the Ports remain committed to working with our regional partners in addressing regional intermodal transportation system needs, such as the Alameda Corridor-East Trade Corridor Program. We are still evaluating the Ports ICF for these regional projects, among other options. Furthermore, although it is unclear how the RTP rail fees would be collected, it should be noted that no additional fees will be provided by the Ports ICF or the existing Alameda Corridor Transportation Authority fee, which is solely for debt service for the Alameda Corridor.

Two additional points of clarification regarding the assumed SB 974 fees are as follows: 1) SB 974 fees are not presently proposed for highway projects, and 2) half of the fee is proposed for emission reduction projects, not transportation projects.

**High Speed Regional Transportation (HSRT)-Freight** – As noted in the RTP, the Ports are in the midst of conducting a feasibility study of implementing an HSRT/zero emissions container mover system in the Ports area. This study is due to be completed in the first quarter of CY2008. As such, it has not been determined if a system will be constructed in the Ports area. More importantly, the connection from the Ports area to the proposed and referenced segment in the I-710 corridor will need to be determined via the I-710 Corridor EIS/EIR. Preparation of this document, along with preliminary engineering commences in February 2008, and will take about three to four years to complete. Another key point of clarification is that the HSRT system is not needed to accommodate the projected Ports Year 2030 throughput of 42.5 million TEUs, which has been incorporated into the RTP baseline. The Ports of Long Beach/Los Angeles have determined that assuming several proposed terminal projects, the Ports can accommodate up to 42.5 million TEUs (which given projected market demand, will be reached sometime between the Year 2020 and 2030).

**“Business Case: Rail Expansion, Emission Reduction, and Grade Separation”**: The statement, “...Because the rail capacity investments have the potential to increase throughput for goods shipped through the Ports of Long Beach and Los Angeles, and reduce the need for port investment for additional capacity..” is flawed for the following reason: the Ports estimated terminal capacity is independent of the rail infrastructure, and thus rail capacity improvements outside the Ports do not reduce the need for Port terminal improvements.

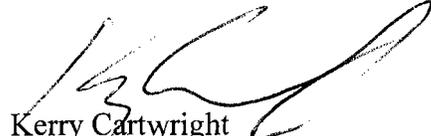
**Inland Ports**: Firstly, it is unclear if the “Inland Port” concept is an actual RTP project, or merely recommended for further study. The inland port needs to be studied in more detail than what has been done to date by SCAG. There are many issues to consider and resolve such as: candidate market segments, trucking costs, mainline rail capacity, and pending proposed intermodal facility projects throughout the region. More importantly, inland ports/facilities are not needed to accommodate the projected Ports Year 2030

Rita Robinson  
January 29, 2008  
Page 3

throughput of 42.5 million TEUs, which has been incorporated into the RTP baseline. The Ports of Long Beach/Los Angeles have determined that assuming several proposed terminal projects, the Ports can accommodate up to 42.5 million TEUs (which given projected market demand, will be reached sometime between the Year 2020 and 2030). It is not currently economically viable to move non-long haul containers via rail to an inland facility. Notwithstanding the economical viability, the railroads will not presently permit these types of short-haul trains on their mainline tracks. Additionally, the number of containers with their first point of rest in the Inland Empire is not a significant amount at this time, based upon detailed origin destination surveys conducted by the Ports of Long Beach/Los Angeles. The inland port concept needs to be studied much more comprehensively and broadly, and involving all entities of the supply chain. Inland port/intermodal facilities are not viable in the near-term or mid-term, but may be viable post-2020, and if the Ports container forecasts exceed 43 million TEUs.

If you have any questions, or need additional information please contact me at 310-732-7702.

Sincerely,



Kerry Cartwright  
Director of Goods Movement

KC:s

cc: Miles Mitchell, LADOT  
Jenny Chavez, Port of Los Angeles  
David Libatique, Office of Mayor Antonio R. Villaraigosa  
Eric Shen, Port of Long Beach

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

January 24, 2008

TO: Miles Mitchell  
Senior Management Analyst  
Department of Transportation  
MS 725

FROM: Jane Blumenfeld   
Principal City Planner  
Department of City Planning

SUBJECT: Comments on SCAG 2008 Regional Transportation Plan

The Los Angeles Department of City Planning (DCP) strongly supports the Southern California Association of Governments' Regional Transportation Plan. DCP has been an active participant in the SCAG's "2% Strategy" that engaged local governments in establishing growth vision for the region and promoting sustainable and balanced development. DCP staff also participates in various working groups including: Economic and Human Development Committee (CEHD), Growth Visioning Committee (GVC), Forecasting Technical Task Force (FTTF), Regional Transportation Plan Technical Advisory Committee (RTP TAC), Modeling Task Force, Transportation and Communication Committee (TCC), and Data Task Force. DCP's comments on the 2008 RTP and PEIR are presented below.

RTP Land Use Impacts

The 2008 RTP Land Use/ Transportation strategies are similar to the City's smart growth policies adopted by the City Council as part of the City's General Plan. Individual Community Plans contain land use and zoning maps that show the distribution of land uses permitted by category of use and intensity of development in much greater detail than adopted in the General Plan Framework Element. The Community Plans are revised periodically to reflect changed conditions and follow the same approval and adoption process as any other general plan element. DCP is currently revising 12 of the City's 35 community plans.

The RTP PEIR recognizes that despite mitigation measures, the land use impacts of the proposed policies and strategies may remain significant. The data provided in both the RTP and PEIR are not sufficiently detailed to evaluate the extent to which individual community plans would meet the requirement of being consistent with the RTP. Furthermore, SCAG has not yet developed a methodology to perform consistency analysis of local general plans with the RTP.

## Baseline versus Policy Growth Forecast

Out of the 24,056,000 population forecast for the SCAG region for the year 2035, the policy growth forecast allocates 250,000 more people than the baseline growth forecast for Los Angeles County (12 588 vs 12 338 million respectively). The policy growth forecast focuses on key opportunity areas that could accommodate greater density, such as transit station areas, transit corridors and activity centers, similar to the City's smart growth policies, to achieve greater air quality benefits through reductions in vehicle miles travelled, vehicle hours travelled and delay and increases in transit use. It is reasonable to assume that most of the additional quarter million people assigned by the policy 2035 growth forecast to Los Angeles County would have to reside within the City of Los Angeles. It is however, infeasible to fully assess the potential impact of this growth on the city's infrastructure and services within the timeframe of the RTP comment period.

In addition, DCP requests that, in Chapter III, Page 90 of the RTP, the following sentence be deleted because it is inaccurate: "For example, planning around the Exposition Line...had stimulated little TOD." The City does not have a model TOD ordinance.

We look forward to working in continued partnership with SCAG to create a more sustainable Southern California.

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

Date: January 29, 2008

To: Rita Robinson, General Manager  
LADOT

From: Detrich B. Allen, General Manager *DBA*  
Environmental Affairs Department

Subject: Comments on the Draft 2008 RTP and Program EIR

The Environmental Affairs Department has reviewed selected portions of the Draft 2008 Regional Transportation Plan (RTP) and Draft Program Environmental Impact Report prepared by the Southern California Association of Governments. We are forwarding these comments to you for incorporation into the Department of Transportation's report to City Council with City staff comments on these documents.

If you have any questions on these comments, please call me at (213) 978-0840, or contact Gretchen Hardison of my staff at (213) 978-0852.

**ATTACHMENT**  
**Environmental Affairs Department**  
**Comments on Draft 2008 Regional Transportation Plan**  
**And Draft Program Environmental Impact Report**

These comments are provided based on a review of selected portions of the Draft RTP Appendices and the Draft Program EIR.

**General Comments**

In May 2007, the City of Los Angeles introduced *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*. This climate action plan provided the framework for over 50 individual actions to mitigate greenhouse gas emissions from municipal and community activities in Los Angeles, including emissions from the transportation sector. We know that implementing transportation measures in this region requires a collaborative effort with many agencies, including SCAG. We would like to ensure that the strategies in the RTP are not in conflict with the City's proposals and programs. We would be happy to meet with your staff to discuss potential partnerships and funding to implement these measures that will improve traffic by reducing congestion and expanding public transportation.

As land use issues are addressed in the RTP and associated Program EIR, SCAG must be sure to consult with the local governments that have land use authority. As policies and mitigation measures are proposed, SCAG must work jointly with local governments to interpret and implement these land use policies and programs.

**Goods Movement**

This section should include specific details on the benefits to communities if the programs proposed in the RTP are implemented, e.g., would traffic delays improve and by how much. If these benefits are discussed elsewhere in the documents, please reference the location of this discussion.

**Transportation Conformity**

State in this document which projects are required to be included in order to meet the Conformity tests. At minimum, note in the project listings which projects were used in the conformity analyses and refer to that section here.

Page 7

"2008 RTP – Base Year: The base year for 8-hour ozone and PM2.5 is 2002; for all other pollutants the base year is 1990." Explain why the base years are not the same for all pollutants.

Page 8

SCAG's Regional Travel Demand Model

"The Model was validated for the Year 2003, which is the base year for the 2008 RTP."

Explain why the model validation was not for a more recent year or why the base year for the 2008 RTP isn't more recent.

Page 18

“Trip rates used in trip generation are based on the 2000 Travel Survey.” Why was the 2000 Travel Survey used for trip generation? Are these the most recent data?

### **Environmental Justice**

Page 16 (and 21)

The aviation noise analysis notes increased noise impacts for those living near highways. It seems logical to assume that these same populations located along highways would experience increased pollutant exposures to CO and PM, localized pollutants that are heavily influenced by mobile sources. Please review the TAZ-based air pollution exposure analysis to ensure that additional exposure impacts are not being missed.

Page 18 (first paragraph)

Provide a numerical breakdown along with the percentage breakdown of the high concentration of minority and low-income populations noted in this paragraph to give a sense of the total population impacted.

Page 18

Explain why the noise impact threshold is 65 db for aviation noise and 66 db for the highway noise analysis? These should be consistent.

Page 19 (last paragraph)

Again, please include actual population figures to give a better sense of the total population impacted.

Page 20 (first paragraph)

In recognition of the disparate highway noise impacts on minority populations, what strategies can SCAG incorporate or recommend to reduce similar impacts from future projects?

### **Draft Program EIR for the Draft 2008 RTP**

Page 2-12: Describe the “4D” model and provide more detail of this analysis in an Appendix. It is unclear from the text how another 50% reduction in VMT is projected, based solely on land use characteristics.

Page 3.2-12: Last paragraph. Clarify that SCAG region represents approx 52% of statewide ghg emissions from the three identified sectors, not 52% of total statewide emissions.

Page 3.2-12: Footnotes. Provide more information on the calculation of ghg in the SCAG region. Also refer the reader to Appendix B for further information. Aside from providing a better understanding of these calculations, this information may be useful to other entities attempting to calculate emissions in smaller jurisdictions.

Page 3.2-20: Does SCAG anticipate that the “full effect of growth policies contained within the RTP” would further reduce emissions, or increase them? It is our understanding that the growth policies (if this refers to the Compass Blueprint) are voluntary. Please explain how the growth policies relate to air quality impact projections, especially in the interpolated years.

Page 3.2-22: Define “substantially greater” than existing levels.

Page 3.2-23: Provide the percentage and annual ton increase for PM10 and PM2.5 in this paragraph.

Page 3.2-23: Table 3.2-5 paragraph: Is this increase projected due to re-entrained road dust as well? If so, add that language here.

Page 3.2-24: The mitigation measures listed in MMAQ-1 and MMAQ-2 are already adopted or planned. The beneficial impacts of these measures should be included in the future baseline projections, or called out as known measures that will be part of the Plan, rather than being termed mitigation measures that need to be added to the Plan.

Page 3.2-31: Clarify in the statement at the top of the page the source of the significant increase in emissions. Is it re-entrained road dust only, or would tailpipe emissions of PM2.5 also be significant? Do any of the mitigation measures listed here address re-entrained road dust?

Page 3.2-34: Perhaps these “mitigation measures” can be termed Best Management Practices, and this document can strongly encourage local lead agencies for construction projects to require these measures on a project-specific basis. It is unclear how SCAG could monitor or enforce these and other “mitigation measures” on projects for which SCAG is not the lead agency. As noted in the general comments above, please work closely with local land use agencies to interpret and implement such measures.

Page 3.2-40: To be consistent with previous impact and mitigation discussions, the “mitigation measure” section here should list approved rules and regulations that lead to reductions in ship, stationary, and area source emissions. Text should assume compliance with these regulations as part of the Plan and not add-on mitigation that would not otherwise occur.

Page 3.2-42: The mitigation measure section should note that the ARB is working to develop and implement a number of measures to reduce ghg emissions from various sources, including the transportation sector. Again, compliance with any future statewide regulations should be assumed. The burden of reducing these emissions will not fall entirely on project proponents and lead agencies. Examples include the low-carbon fuel standard and AB1493, described earlier in this document. As the state and region move forward with standardized methodologies to estimate ghg emissions, the relative benefits of implementing transportation and land use measures will become more clear.

## **Appendix B – Air Quality**

Page 4: Corridors selected for risk analysis: Proximity to high density residential uses is another important criterion to select study corridors, given that the intent is to address worst case risk situations. Would using the two criteria together (heavy usage and proximity to dense residential uses) have resulted in different freeway segments being studied?

Page 9: Provide a brief discussion of the differences between the ISCST3 and CALINE4 models and how results may have been different if the other model was used.

### Air Quality Greenhouse Gas Calculation Methodology:

#### **Construction Emissions**

Provide the source(s) of information used to determine the number and size of future construction projects, and the amount of residential and nonresidential projects. Also, what is the basis and meaning of the 5 percent and 10 percent redevelopment factors?

#### **Mobile Emissions**

Are mobile sources a large component of methane emissions? Please provide approximate percentage of regional CH<sub>4</sub> emissions that come from the transportation sector.



**Metro**

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Metropolitan Transportation Authority

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**REVISED**

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**PLANNING AND PROGRAMMING COMMITTEE  
JANUARY 16, 2008**

**SUBJECT: COMMENTS ON SCAG DRAFT 2008 REGIONAL  
TRANSPORTATION PLAN**

**ACTION: APPROVE METRO COMMENT LETTER ON THE DRAFT 2008  
REGIONAL TRANSPORTATION PLAN**

**RECOMMENDATION**

Approve for release comments on the Southern California Association of Governments' (SCAG) Draft Regional Transportation Plan (RTP).

**ISSUE**

In December 2007, SCAG released the Draft 2008 RTP for public comment. The RTP identifies regional transportation priorities for the six-county region through 2035.

**POLICY IMPLICATIONS**

All our projects and priorities must be included in SCAG's RTP to be eligible for federal funds. Conversely, any projects in Los Angeles County that are included in the RTP that are not supported by us are also eligible for federal funding and if included in the RTP may be required for air quality conformity purposes. Projects required for air quality conformity purposes must be implemented unless substituted with projects of equal air quality benefit.

**OPTIONS**

The Board can approve the release of the comment letter, modify the comment letter, or choose not to release a formal comment letter.

**FINANCIAL IMPACT**

The RTP identifies a ~~\$569~~ \$545 billion transportation program for the six-county area through 2035, consisting of \$413 billion in traditional revenue sources and ~~\$156~~ \$132 billion in revenue increases or innovative financing strategies. Los Angeles County is assumed to generate \$231.7 billion in traditional revenue sources through 2035.

## BACKGROUND

In early December 2007, SCAG released its Draft 2008 RTP for public review. Comments are due by February 18, 2008. Attached for the Board's consideration is a draft letter of comment on the Draft RTP.

In general, the draft RTP is a well written document that properly identifies many of the key transportation issues that the region is facing. One of the most significant differences between the Draft 2008 RTP and our adopted 2001 Long Range Transportation Plan (LRTP), is that many new transportation projects have been proposed in the RTP for Los Angeles County that are beyond revenues that we assume to be available from traditional sources. SCAG is assuming that these projects are funded with a combination of traditional funding, innovative funding (e.g., container fees and public private partnerships), revenue increases (e.g., SCAG is assuming a 10 cent increase in the state gas tax and a 10 cent increase in the federal gas tax), and traditional funds between 2030 and 2035 that have no Board commitments. These projects include the following:

- I-710 Truck Lanes between ports and SR-60
- I-710 Tunnel from I-10 to I-210
- High Desert Corridor connecting LA and San Bernardino
- I-5 Carpool and Truck Climbing Lanes in Santa Clarita
- I-5 Carpool Lanes from SR 19 (Rosemead Blvd) to I-710
- ~~US-101 High Occupancy Toll Lanes from SR-23 to SR-170~~
- Regional Connector
- Green Line LRTP Extension
- Gold Line Extension to Montclair
- Purple Line Extension to Western and La Cienega
- High Speed Rail System
- Rail Capacity Improvements (Tier 4 engines, grade separations, capacity improvements)
- Orangeline Maglev Project in Southeastern Los Angeles County and Orange County

Many of the above projects are included in our 2001 Strategic Plan. Staff will work with SCAG to reconcile financial forecasts between the two agencies, and to determine if these projects assume new funding commitments from traditional funding sources. If any of the projects are removed from the Draft 2008 RTP, they would not be eligible for preliminary engineering or environmental analysis in accordance with Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU).

SCAG plans to adopt a final RTP in March or April of 2008. Metro is scheduled to release its draft LRTP in March 2008 and adopt the final LRTP in June 2008. Since the adoption of the LRTP will be after the adoption of the RTP, staff will coordinate closely with SCAG staff throughout the LRTP development and review process. If there is any conflict in projects or project schedules between the final LRTP and final RTP, SCAG could amend their RTP to incorporate any necessary changes after our LRTP is adopted. There is precedent for amending the RTP. The SCAG 2004 RTP was recently amended to incorporate the CMIA projects from the state bond initiative.

#### **NEXT STEPS**

Upon Board approval, our comments will be transmitted to SCAG for their consideration in developing their final 2008 RTP. SCAG is scheduled to adopt their final 2008 RTP at their March or April Regional Council meeting.

Prepared By: Brad McAllester, Executive Officer  
Long Range Planning & Coordination

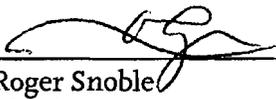
#### **ATTACHMENTS**

- A. Draft comment letter on SCAG Draft 2008 RTP



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Carol Inge  
Chief Planning Officer



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Roger Snoble  
Chief Executive Officer

**Attachment A**  
**Draft Comment Letter on SCAG Draft 2008 RTP**

January 24, 2008

Hasan Ikhata, Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) Draft 2008 Regional Transportation Plan (RTP). We would like to compliment SCAG on the inclusive process that was undertaken to develop the draft RTP. In general, we find the document to be well written in identifying many of the key challenges facing our region through 2035. The Metro Board has approved the following comments at their January 24<sup>th</sup> meeting, and requests that they be addressed in developing the final 2008 RTP.

1. In January, the Metro Board was briefed on preliminary recommendations for Metro's draft 2008 LRTP. That briefing included a presentation on our updated financial model, which has been revised to reflect expected increases in project construction costs as well as the impact of the State funding shortfall. SCAG should be aware that Metro does not anticipate adding any new projects in the draft 2008 LRTP and the schedule of some existing projects may be impacted. Metro's planning staff will coordinate with SCAG planning staff and provide you with our latest financial assumptions, as well as project, cost, and scheduling assumptions.
2. The draft 2008 LRTP identifies various projects that have not been approved by the Metro Board through the 2001 LRTP. We note that Metro anticipates releasing its draft 2008 LRTP in March 2008 and adopting a final 2008 LRTP in June 2008. As a result, SCAG should be aware that it may need to amend its RTP to reflect Metro's adopted LRTP as some future point. We note that there is precedent for such amendments, as the 2004 RTP was recently amended to incorporate CMIA projects funded through the State Bond. Projects not included in Metro's Constrained LRTP to date include the following:
  - I-710 Truck Lanes between ports and SR-60
  - I-710 Tunnel from I-10 to I-210

- High Desert Corridor connecting LA and San Bernardino
  - I-5 Carpool and Truck Climbing Lanes in Santa Clarita
  - I-5 Carpool Lanes from SR 19 (Rosemead Blvd) to I-710
  - ~~US 101 High Occupancy Toll Lanes from SR 23 to SR 170~~
  - Regional Connector
  - Green Line LRTP Extension
  - Gold Line Extension to Montclair
  - Purple Line Extension to Western and La Cienega
  - High Speed Rail System
  - Rail Capacity Improvements (Tier 4 engines, grade separations, capacity improvements)
  - Orangeline Maglev Project in Southeastern Los Angeles County and Orange County
3. Through the review and adoption of the Air Plan, Metro provided comments regarding rail electrification and Tier 4 locomotives, which were assumed to be funded and implemented by 2014. Metro expressed its concern as to whether these programs could be accomplished by that deadline. SCAG should clarify whether these proposals are still included in the draft RTP. We remain concerned that SCAG not commit to these strategies or others, that cannot realistically be attained on schedule and would put the region at risk for air quality sanctions and the loss of federal transportation dollars.
  4. We have reviewed SCAG's demographic forecast for Los Angeles County and have noted that population and employment is decreasing in comparison to the 2004 RTP, in various corridors where major transit facilities are planned. We are concerned that these reductions are not consistent with SCAG's stated goal to encourage development along transit corridors, and we would seek revisions to growth forecasted for these corridors.
  5. It is our understanding that SCAG did not include its MAGLEV proposal in its air quality conformity analysis and that conformity was attained without this project. This is consistent with the 2004 RTP, which listed the MAGLEV in its constrained program but did not assume air quality credit for it. We recommend that this practice be continued for the 2008 RTP. We would also like to see the RTP

confirm that this project is fully funded through private funds, and that Metro has no financial obligation. /

6. We will work with SCAG staff to ensure that SCAG is aware of our LRTP schedules for Los Angeles County transportation projects. It is important for air quality conformity purposes that the RTP project schedules to be consistent with Metro's project schedules. We need to avoid the need to go through the air quality substitution process that happened to Metro on the Red Line and to OCTA on the Centerline project.
7. Attached to this letter are additional comments on specific elements of the draft RTP.

Thank you for the opportunity to comment on the draft RTP. Metro looks forward to working with SCAG in addressing these comments. If you have any questions, please contact Brad McAllester at 213-922-2914.

Sincerely,

Roger Snoble  
Chief Executive Officer

## ADDITIONAL COMMENTS ON DRAFT 2008 RTP

- Page 13, SCAG states that an additional \$10B is needed for arterial and transit related system preservation needs through 2035 (27years from now). Metro's latest survey includes an unfunded backlog of \$9.9 B for Los Angeles County for every road and type of system preservation – 3R, Maintenance for Arterials and Local Streets. System preservation needs for arterials are estimated at approximately \$5.4 B for arterials comprised of:

\$1.2 B for Arterial 3R unmet backlog

\$2.8 B for annual Arterial 3r unmet cost to maintain backlog for 27 years

\$0.167B of unmet maintenance backlog

\$1.2B for annual Arterial maintenance Unmet cost to maintain for 27 years.

There is another \$4 5.5B of system preservation needs on local streets (maintenance and 3R).

- Projects in the Pipeline (p. 95): 5/14 HOV connector will be in construction shortly, and others such as 5/170, 57/60, 405/605, etc. are not even in the strategic element of our LRTP. In addition, I-405 HOV gap closure in the Westside of LA (1<sup>st</sup> bullet), I-5 and SR-14 (3<sup>rd</sup> bullet), I-5 and I-605 (4<sup>th</sup> bullet), I-10 and SR-60 (5<sup>th</sup> bullet) and US-101 (7<sup>th</sup> bullet) are all too broad and are in need of better clarification.
- The RTP references a Major Corridor Study that has been completed for SR-60. Metro is not aware of this Study. The Multi-County Goods Movement Action Plan (MCGMAP) considered preliminary criteria and conducted modeling to identify an East/West freight corridor. The final recommendation of the MCGMAP, however, is that further analysis of parallel East/West corridors needs to take place with consideration given to both alternative technologies and potential East/West non-freeways corridors.
- Metro is pleased to see SCAG's inclusion of alternative technology methods for moving goods.

Additional City of Los Angeles RTIP Projects for SCAG's 2008 Regional Transportation Plan

Sys-tem*	RTP ID	Route	Description	Project Cost (\$1,000'S)	Comments	DOT comments (2/1/08)
L		0	Arbor Vitae Street/I-405 Interchange - Widening of Arbor Vitae Street between Airport Blvd. and La Cienega from 2 & 4 lanes to 6 lanes with a continuous two-way left turn lane.	5,385	LA996408 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L	17850	0	Sepulveda Blvd./I-105 WB Off-Ramp Widening - Widen the existing WB I-105 off-ramp to NB Sepulveda Blvd., from 1 to 2 lanes of traffic & add 2nd WB exit-only lane on the mainline freeway, between Nash & Sepulveda off-ramps.	3,600		Concur with SCAG's comment; do not have to include this one as "additional" project
L		0	National Bl. Widening From Sawtelle Ave. to Sepulveda Bl. - Widen National Blvd. & will allow for a 2nd w/b left-turn lane & an additional e/b right-turn only lane for the 1,405 s/b on-ramp, a 2nd left-turn lane on National at Sepulveda and a 2nd s/b left	774	LA996419 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L		0	Sepulveda Bl Widening between Ventura Bl and Greenleaf St. - Widen the southbound curb lane on Sepulveda Blvd. from 10 to 18 preventing the bottleneck caused by the blockage of this lane by vehicles waiting to get onto the 1-405 on-ramp.	858	LA996424 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L		0	Harbor Transitway Arterial HOV Connection With Downtown - Provide Bus/HOV preferential treatments on major arterials connecting the Northern Terminus of Harbor Transitway at Adams Blvd. with Downtown Los Angeles.	5,151	New project? Can find no record of this in 2006 RTIP, please provide RTIP ID#	Funded in 1995 and almost 100% complete; ok to remove from list
L		0	Alameda Street/N. Spring Arterial Redesign - Phase 2 is the appraisal and acquisition of the right-of-way necessary to widen, align and improve Alameda Street to improved traffic circulation and encourage property development.	11,540	LA98STIP3 "Phase 1" previously obligated, otherwise no record of Phase 2 in RTIP - please provide RTIP ID#	This project is already incorporated into Phase 1 project which was previously obligated
L		0	ATSAC - Golden State Fwy Corridor - Automated Traffic Surveillance & Control (ATSAC) type facilities & bus priority infrastructure to approximately 96 signalized intersections thru implementation of a computer-based real time traffic signal monitoring & c	17,843	LA996301 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L		0	ATSAC- Interconnect Gap Closure Phase II - This project will provide a synchronized time pulse, via a hybrid communication system, for up to 7894 non-interconnected signalized intersections to insure accurate signal timing. These intersections are not cu	1,927	LA996302 "Phase 1" previously obligated, otherwise no record of Phase 2 in RTIP - please provide RTIP ID#	Concur with SCAG's comment; OK to remove from list
L		0	Centinela Widening (Washington Bl. To Short Ave.) - Widen Centinela Avenue from Washington Blvd. to Short Avenue and will allow for two lanes in each direction as well as various left turn pocket channelization.	4,011	LA996413 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L		0	City/County Traffic Management Integration Project - This project will develop a system integrator to provide a data link between the City's existing Automated Traffic Surveillance and Control (ATSAC) Center and the proposed County's Traffic Management Ce	1,661	LA996300 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L		0	Exposition Park Traffic Management Plan (ATCS) - Upgrade the existing Automated Traffic Surveillance & Control (ATSAC) system by installing the Adaptive Traffic Control System (ATCS) software, install Changeable Message Signs (CMS) & closed circuit TV cam	10,936	LA996310 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list

Additional City of Los Angeles RTIP Projects for SCAG's 2008 Regional Transportation Plan

Sys-tem*	RTP ID	Route	Description	Project Cost (\$1,000'S)	Comments	DOT comments (2/1/08)
L		0	Harbor Gateway/Normandie Ave Corridor Improvement - Widen or improve 3 intersections along Normandie Ave corridor south of the San Diego Fwy to improve regional access to proposed 2.9 million SF Harbor Gateway Industrial development.	426	LA996412 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L		0	Arbor Vitae St. Widening - La Cienega Bl. To Airport Bl. - The project will widen Arbor Vitae Street to provide for two lanes in each direction and a continuous two-way left-turn lane from La Cienega Blvd. to Airport Blvd.	2,491	LA996408 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L	LA0C8036	0	Hyperion Ave. Under Waverly Dr. Bridge Replacement - HBRR. Project removes and replaces Waverly Bridge with a longer span structure to provide safety shoulders, bike lanes and sidewalks along Hyperion Ave. Funding contingent upon sponsor providing and ad	4,647		Concur with SCAG's comment; do not have to include this one as "additional" project
L		0	Laurel Canyon Bl. Bridge over Los Angeles River Widening - Laurel Canyon Bridge over LA River will be widening from 4 lanes to 6 lanes to improve the poor level of service. Bike Lanes will be added to access a planned bike path along the river. Funding	365	LA0C8038 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L	LA0C8385	0	EI Sereno DASH Procurement - Purchase of two (2) additional low-floor, propane-powered 30' ft. buses for the EI Sereno DASH service to relieve overcrowding and meet unmet demands.	604		Concur with SCAG's comment; do not have to include this one as "additional" project
L		0	Sepulveda Bl. Tunnel under Mulholland Dr. Widening - HBRR. Sepulveda Blvd. Tunnel project widens the 1929 structure to match the roadway approach from 3 to 4 lanes and to add bike lanes. Widening the tunnel improves traffic safety, LOS and bike safety	930	LA0C8032 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L		0	Victory Bl. Widening - Topanga Cyn. Bl. to De Soto Ave. - Widen Victory Bl. to provide an additional lane in each direction.	11,655,000	New project? Can find no record of this in 2006 RTIP, please provide RTIP ID#	Funded through MTA's 2007 CFP
L	LA0C8084	0	Winnetka Ave. Bridge Over LA River & Bikeway - Widen the Bridge for additional lanes and LA River Bikeway	5,701,000		Concur with SCAG's comment; do not have to include this one as "additional" project
L		0	Vanowen St. Bridge Over LA River & Bikeway - Widen the bridge for additional lanes and LA River Bikeway	6,405,000	LA0C8042 - previously obligated project, no current programming exists	Concur with SCAG's comment; OK to remove from list
L	LA0B7234	0	Overland Ave. Bridge Over I-10 - Widen the overcrossing bridge to provide an additional Northbound lane on Overland Ave.	6,768,000		Concur with SCAG's comment; do not have to include this one as "additional" project
L		0	Venice Bl. Widening at La Cienega Bl. - Widen both sides of Venice Bl. to provide additional capacity and improve access to the I-10 Fwy on ramp.	1,056,000	New project? Can find no record of this in 2006 RTIP, please provide RTIP ID#	Funded through MTA's 2007 CFP
L		0	Lincoln Bl. Widening at Venice Bl. - Widen both sides of Lincoln Bl. at Venice Bl. to provide an additional northbound and southbound lane.	1,050,000	New project? Can find no record of this in 2006 RTIP, please provide RTIP ID#	Funded through MTA's 2007 CFP

Additional City of Los Angeles RTIP Projects for SCAG's 2008 Regional Transportation Plan

Sys-tem*	RTP ID	Route	Description	Project Cost (\$1,000'S)	Comments	DOT comments (2/1/08)
L		0	118 FWY. WB Off-Ramp at Tampa Ave. - Widen the off-ramp and provide two lanes exit from the WB 118 FWY and install an additional southbound left turn on Tampa Ave. on-ramp/EB 118 FWY	1,050,000	New project? Can find no record of this in 2006 RTIP, please provide RTIP ID#	Funded through MTA's 2007 CFP
L		0	Balboa Bl. Widening at Rinaldi St. - Widen the S/S of Balboa Bl. between Rinaldi St. and the 118 FWY S/B on-ramp to improve safety and capacity.	1,438,000	New project? Can find no record of this in 2006 RTIP, please provide RTIP ID#	Funded through MTA's 2007 CFP
L		0	Widening San Fernando Road at Balboa Rd. - Widening and re-stripping of W/S of San Fernando Rd. at Balboa Rd. to provide additional capacity	1,632,000	Funded through MTA's 2007 CFP	
L		0	Vermont Ave. Bridge Widening NB Access FWY. - Widen the Vermont Ave. overcrossing structure to accommodate dual left-turn traffic lanes leading to 101 FWY NB on-ramp	11,109,000	Partially funded through MTA's 2007 CFP	
L		0	Cesar Chavez Ave./Lorena St./Indiana St. Intersection Improvements - Reconstruct existing 5-legged intersection into a roundabout to improve safety and capacity.	3,021,000	Funded through MTA's 2007 CFP	
L		0	Olympic Bl. and Mateo St. Goods Movement Improvements - Ph.II - Widen Olympic Bl. to accommodate an exclusive right turn lane, improve traffic signals, provide sidewalks, bus pads and transit amenities.	4,421,000	Funded through MTA's 2007 CFP	
L		0	South Wilmington (Fries Ave.) Grade Separation - Provide a grade separation for the South Wilmington area over heavily utilized rail lines.	58,289,000	Partially funded through MTA's 2007 CFP	
L		0	I-110 FWY./C St. Interchange Improvements - Improve the connection between the I-110 & C St. and consolidate two closely spaced intersections.	22,156,000	Partially funded through MTA's 2007 CFP	
L		0	I-110/SR 47 Interchange & John S. Gibson Intersection/NB I-110 Ramp Access - Improve the connection between the I-110 FWY & John S. Gibson Bl. and add one lane to the WB SR-47 to NB I-110 FWY connector.	29,681,000	Partially funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - North Hollywood - Signal Synchronization	4,383,000	Funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - Pacific Palisades/Canyons - Signal Synchronization	6,388,000	Funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - Platt Ranch - Signal Synchronization	5,404,000	Funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - Reseda - Signal Synchronization	3,740,000	Funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - Canoga Park - Signal Synchronization	3,101,000	Funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - Coliseum / Florence - Signal Synchronization	18,928,000	Partially funded through MTA's 2007 CFP	
L		0	Harbor Blvd Signalized Intersection Improvements from Swinford St to 6th St - Project will upgrade traffic signal equipment to operate in "limited service" when trains are present at various locations in the San Pedro area	2,069,000	Partially funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - San Pedro - Signal Synchronization	2,936,000	Funded through MTA's 2007 CFP	
L		0	ATSAC / ATCS - Wilmington - Signal Synchronization	1,679,000	Funded through MTA's 2007 CFP	
L		0	Highway-Rail Grade Crossing Intersection Improvement Project - Improve 40 highway-rail grade crossing warning system and adjacent preempted traffic signals to current standards	8,706,000	Funded through MTA's 2007 CFP	
L		0	Solano Canyon/Zanja Madre/Chinatown-Broadway Bus Stop Improvements - Upgrade bus stops/streetscape in Central City North area along North Broadway	1,117,000	Funded through MTA's 2007 CFP	
L		0	C Chavez Transit Corridor Improvements (110 FWY to Alameda) - Streetscape elements along Cesar Chavez between 110 Freeway & Alameda St	2,144,000	Funded through MTA's 2007 CFP	

Additional City of Los Angeles RTP Projects for SCAG's 2008 Regional Transportation Plan

Sys- Item*	RTP ID	Route	Description	Project Cost (\$1,000'S)	Comments	DOT comments (2/1/08)
L		0	LA Valley College RapidBus Transit Station - Upgrade transit rider access at/near the LAVC Orange Line station	2,482,000	Funded through MTA's 2007 CFP	
L		0	Los Angeles Pierce College - Bus Rapid Transit Station Extension - Install bus shelters, benches, trash receptacles, security lighting, decorative crosswalks, and sidewalk improvements.	2,465,000	Funded through MTA's 2007 CFP	
L		0	Century City Urban Design and Pedestrian Connection Plan - Streetscape elements by an area bounded by Santa Monica (N), Pico (S), Century City West (W) and Century City East (E)	3,356,000	Funded through MTA's 2007 CFP	
L		0	Expo Line Stations Streetscape Project - East (Crenshaw Bl to Jefferson Bl) - Streetscape plan, medians and landscaping for Exposition Light Rail Line Stations east of Vermont (including Vermont)	3,402,000	Funded through MTA's 2007 CFP	
L		0	Los Angeles Trade-Tech Intermodal Links with Bus and Metro - Project will encourage increased transit use and pedestrian connectivity of the MBL and Metro buses on Grand Ave at Trade-Tech through enhanced pedestrian experience	2,534,000	Funded through MTA's 2007 CFP	
L		0	Washington Boulevard Transit Enhancements - Pedestrian improvements include bus shelters, decorative paving, signage, landscaping and artistic elements.	2,355,000	Funded through MTA's 2007 CFP	
L		0	Main Street Bus Stop and Pedestrian Improvement Project - Bus stop improvement with new bus shelters, benches, trash receptacles, security lighting and decorative crosswalks	771,000	Funded through MTA's 2007 CFP	
L		0	Fashion District Streetscape Phase II - Streetscape improvements	1,971,000	Funded through MTA's 2007 CFP	
L		0	Los Angeles City College Pedestrian Enhancements - Install bus shelters, benches, trash receptacles, security lighting, decorative crosswalks, and sidewalk improvements.	2,289,000	Funded through MTA's 2007 CFP	
L		0	Sunset Junction Transit Plaza - Construct multi-modal transit plaza at Sunset Junction; includes acquisition of property	1,668,000	Funded through MTA's 2007 CFP	
L		0	Hollywood Pedestrian/Transit Crossroads Phase 2 - Streetscape project to install security lighting, wayfinding signs and landscaping	802,000	Funded through MTA's 2007 CFP	
L		0	Eastside Light Rail Pedestrian Linkages - Crosswalk and sidewalk improvements, including pedestrian signage, street tree with tree wells and street furniture	3,112,000	Funded through MTA's 2007 CFP	
L		0	Angels Walk Highland Park - Self guided historic walking tour.	784,000	Funded through MTA's 2007 CFP	
L		0	Angels Walk North Hollywood - Self guided historic walking tour.	714,000	Funded through MTA's 2007 CFP	
L		0	Los Angeles Neighborhood Initiative West Adams Enhancements - Install illuminated community gateway markers, security lighting, and new trees with new tree wells.	1,070,000	Funded through MTA's 2007 CFP	
L		0	Angels Walk Crenshaw - Self guided historic walking tour.	720,000	Funded through MTA's 2007 CFP	
L		0	Los Angeles City College Red Line Station Extension - Install bus shelters, benches, trash receptacles, security lighting, decorative crosswalks, and sidewalk improvements.	2,543,000	Funded through MTA's 2007 CFP	
L		0	Branching Out - Plant trees on streets throughout City of Los Angeles	1,191,000	Funded through MTA's 2007 CFP	
L		0	Encino Park-n-Ride Facility - Renovate/expand facility; add 50 parking spaces, upgrade lighting and ingress/egress.	2,002,000	Funded through MTA's 2007 CFP	
L		0	Oliver/Pico Bus Stop Improvement - Upgrade/extend bus zone which serves over 20 lines in Downtown.	422,000	Funded through MTA's 2007 CFP	

Additional City of Los Angeles RTP Projects for SCAG's 2008 Regional Transportation Plan

Sys-tem*	RTP ID	Route	Description	Project Cost (\$1,000'S)	Comments	DOT comments (2/1/08)
L		0	DASH Fleet Capacity Increase - Purchase of 32 higher capacity replacement vehicles.	11,796,000	Partially funded through MTA's 2007 CFP	
L		0	Commuter Express Fleet Upgrade - Purchase of 85 CNG buses to replace diesel vehicles.	39,560,000	Partially funded through MTA's 2007 CFP	
L		0	WiFi on Gold Line, Chinatown, & Little Tokyo/Arts District - WiFi internet installed on Gold Line trains, poles, stations, Eastside Extension, Chinatown, and Little Tokyo/Arts Districts to increase rail use and reduce car trips to downtown LA	1,189,000	Funded through MTA's 2007 CFP	
L		0	Downtown LA Green Transit Alternative Modes Trial Program - Pedicab service from Union Station to Downtown.	997,000	Funded through MTA's 2007 CFP	
L		0	Hollywood Integrated Modal Information System - Installation of electronic direction and parking availability signs with internet connectivity to provide real-time information intended to increase transit ridership	3,407,000	Partially funded through MTA's 2007 CFP	
L		0	ExperienceLA.com Web 2.0: Interactive Transit Mapping & WiFi - Upgrade Experience LA to include mapping.	533,000	Funded through MTA's 2007 CFP	
L		0	San Fernando Rd. Bike Path Ph. IIIA/IIIB - Construction of bike path between Branford St. and City of Burbank	19,705,000	Partially funded through MTA's 2007 CFP	
L		0	Imperial Hwy. Bike Lanes - Modification of median island and widening of Imperial Hwy. along 1000' just east of Pershing Dr. to accommodate bike lanes.	3,349,000	Funded through MTA's 2007 CFP	
L		0	Manchester Ave. Bike Lanes - Modification of median island along Manchester Ave. between Sepulveda Bl. and City of Inglewood to accommodate bike lanes.	2,749,000	Funded through MTA's 2007 CFP	
L		0	Bike Wayfinding Signage Program - Bicycle wayfinding signage program.	496,000	Funded through MTA's 2007 CFP	
L		0	Bike Safe Roadway Grates - Upgrade existing roadway grates to improve bike safety and promote cycling usage	2,071,000	Partially funded through MTA's 2007 CFP	

City of Los Angeles Department of Transportation  
 Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
<b>Congested Corridors</b>									
1	LA	Westside Cities, Central Los Angeles, San Gabriel Valley	I-10	Corridor-wide	Expansion of Freeway Service Patrol	\$ 10			SRTP I-10 Congested Corridor
2	LA	Central Los Angeles	I-10	EB Western Ave, Arlington Ave, Crenshaw Blvd off-ramps	Modify EB off-ramps at Western Ave, Arlington Ave, Crenshaw Blvd	\$ 50			SRTP I-10 Congested Corridor
3	LA	Central Los Angeles	I-10/US-101	Cesar Chavez Ave	Widen Cesar Chavez Ave overcrossing over I-10 and relocate NB 101 Fwy ramps at Cesar Chavez Ave	\$ 100			SRTP I-10 Congested Corridor
4	LA	Westside	I-10	Lincoln Blvd ramps improvement		\$ 20			LADOT Capital Programs
5	LA	Westside	I-10	Centinela Av ramps improvement		\$ 20			LADOT Capital Programs
6	LA, Beverly Hills, Culver City	Central Los Angeles, Westside Cities	I-10	Major ramp reconfiguration at Robertson and Venice		\$ 130			Westside Mobility Study
7	LA	Central Los Angeles	US-101	Widen Edgeware bridge on SB US-101 between Glendale Blvd on-ramp and US-101/I-110 interchange to provide auxiliary lanes		\$ 20			LADOT - RTP
8	LA	Central Los Angeles	US-101	Construct direct NB on and off-ramps to the Hollywood Bowl parking lots		\$ 40			LADOT - RTP
9	LA	Central Los Angeles	US-101	Build new SB US-101 on- and off-ramps at Campo de Cahuenga Way (Ventura Blvd exit from northbound direction)		\$ 30			LADOT - RTP
10	LA	San Fernando Valley	US-101	Widen Canoga Ave under the freeway overpass to full standard		\$ 10			LADOT - RTP
11	LA	Central Los Angeles	I-110	Between US-101 and I-10 - reconfigure freeway ramps to provide additional NB lane and SB lane in the downtown area		\$ 500			LADOT Capital Programs
12	LA	San Fernando Valley	I-210	Additional lane on the connector from NB I-210 to NB I-5		\$ 100			LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
13 LA	San Fernando Valley	I-5	I-5 ramps at Roxford St/Sepulveda Blvd	I-5 ramps at Roxford St/Sepulveda Blvd - Widen and signalize intersection to improve access to SB I-5 ramps.	Fwy	\$ 5			LADOT Capital Programs
14 LA	San Fernando Valley / Westside	I-405	NB I-405/NB I-5 Interchange	Extend 4 <sup>th</sup> lane NB on 405 Fwy all the way to I-210 freeway.	Fwy	\$ 10			LADOT Capital Programs
15 LA	San Fernando Valley	US-101	Canoga Ave/US-101 WB off-ramp	Canoga Ave/US-101 WB off-ramp - Widen WB off-ramp to provide a RT only lane to Canoga Ave.	Fwy	\$ 5			LADOT Capital Programs
16 LA	San Fernando Valley	I-405	I-405/Nordhoff St	Widen ramps to reduce congestion.	Fwy	\$ 10			LADOT Capital Programs
17 LA	San Fernando Valley	I-405	I-405/Roscoe Blvd	Widen south side of Roscoe Blvd to add a EB through lane and widen the SB on-ramp to add a car-pool bypass lane.	Fwy	\$ 6			LADOT Capital Programs
18 LA	San Fernando Valley	I-405	I-405/Sherman Way	Widen SB on and off-ramp to add a lane.	Fwy	\$ 10			LADOT Capital Programs
19 LA	San Fernando Valley	I-405	NB I-405 at Sepulveda/Ventura Blvd	Build a new NB off-ramp and on-ramp at Morrison St to relieve congestion at Sepulveda/Ventura intersection.	Fwy	\$ 20			LADOT Capital Programs
20 LA	San Fernando Valley	US-101	US-101/Van Nuys Blvd	Reconfigure WB on/ off-ramps as hook ramps connecting onto Riverside Dr & eliminate existing WB off-ramp.	Fwy	\$ 45			LADOT Capital Programs
21 LA	San Fernando Valley	US-101	US-101/Laurel Canyon Blvd	Widen WB on-ramp to three lanes to provide a carpool by-pass lane.	Fwy	\$ 4			LADOT Capital Programs
22 LA	Central Los Angeles	US-101	SB US-101 on-ramp at Universal Center Dr	Build a new direct on-ramp from Universal Center Dr.	Fwy	\$ 20			LADOT Capital Programs
23 LA	Central Los Angeles	US-101	NB US-101 on-ramp at Hollywood Blvd	Lengthen and widen the ramp to two lanes.	Fwy	\$ 2			LADOT Capital Programs
24 LA	Central Los Angeles	US-101	SB US-101 off-ramp at Western Ave	Widen SB US-101 off-ramp at Western Ave via Lexington Ave to provide additional left-turn lane.	Fwy	\$ 2			LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
25 LA	Central Los Angeles	US-101	NB US-101 off-ramp and SB US-101 on-ramp at Santa Monica Ave/Melrose Ave	Widen NB US-101 off-ramp to provide two exit lanes, and add a dedicated right turn only lane at intersection; and widen EB Santa Monica Blvd at SB US-101 on-ramp to add a right turn only lane onto the on-ramp.	Fwy	\$ 5			LADOT Capital Programs
26 LA	Central Los Angeles	US-101	NB US-101 off-ramp at Melrose Ave	Widen off-ramp to provide two exit lanes, and add a dedicated right turn only lane at intersection to provide three lanes (Left turn, optional and right turn).	Fwy	\$ 2			LADOT Capital Programs
27 LA	Central Los Angeles	US-101	SB US-101 ramps at Normandie Ave/Melrose Ave	Extend the off-ramp to connect directly to Normandie Ave; Build a service road from the off-ramp to Melrose Ave and connect directly to the SB on-ramp at Melrose. (Right-of-Way Required)	Fwy	\$ 10			LADOT Capital Programs
28 LA	Central Los Angeles	I-10	EB I-10 on-ramp at Olympic Blvd	Make the ramp accessible from both directions on Olympic Blvd, realign the ramp and install traffic signal. (Right-of-Way Required)	Fwy	\$ 3			LADOT Capital Programs
29 LA	Central Los Angeles	I-5	SB I-5 off-ramp at Calzona St in Boyle Heights	Construct a deceleration lane and a barrier between the off-ramp and the on-ramp.	Fwy	\$ 5			LADOT Capital Programs
30 LA	Central Los Angeles	I-405	NB I-405 off-ramp at Imperial Hwy	Widen off-ramp from two lanes to three lanes.	Fwy	\$ 3			LADOT Capital Programs
31 LA	Central Los Angeles	I-110	I-110/SR-47/Harbor Blvd Interchange Improvements	Lengthen deceleration and sight distances on the I-110 and SR-47 connectors, separate truck traffic from auto traffic to eliminate traffic conflicts.	Fwy	\$ 16			LADOT Capital Programs
<b>Freeway-to-Freeway Interchanges</b>									
32 LA	Central Los Angeles	I-5	Improve I-5 and I-10 interchange		Fwy	\$ 200			2001 LRTP Strategic Plan
33 LA	Central Los Angeles	I-5	Improve I-5 and Rt 134 interchange		Fwy	\$ 200			2001 LRTP Strategic Plan
34 LA	Central Los Angeles	US-101	Improve US-101 and I-110 interchange	NB I-110 connector to NB I-101; Extend 2 lanes to Glendale Blvd off-ramp (eliminate merging of 2 lanes into 1 lane)	Fwy	\$ 30			LADOT - RTP

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
<b>Auxiliary Lanes</b>									
35	LA, LA Co	Central Los Angeles	I-5	SB from Ditman Ave to Calzona St	Construct SB auxiliary lane on I-5 from Ditman Ave to Calzona St	Fwy	\$ 20		SRTP I-5 Congested Corridor
36	LA	Central Los Angeles	I-5	SB from Marietta St to Lorena St	Construct SB auxiliary lane on I-5 from Marietta St to Lorena St	Fwy	\$ 20		SRTP I-5 Congested Corridor
<b>HOV Lanes</b>									
37	LA	Central Los Angeles	I-5	Add HOV lane in both directions between SR-134 and I-110		Fwy	\$ 1,000		LADOT Capital Programs
38	LA	Central Los Angeles	SR-2	Construct 4 lane tunnel for HOV between SR-2 Terminus and I-10 Fwy		Fwy	\$ 2,000		LADOT Capital Programs
39	Industry, LA, LA Co, Montebello, Monterey Park, South El Monte	San Gabriel Valley, Central Los Angeles	SR-60	Add HOV lane from Rt 101 to I-605 (both directions)		Fwy	\$ 244		2001 LRTP Strategic Plan
40	LA	Central Los Angeles	US-101	Add HOV lanes in both directions between Topanga Canyon Blvd and City Boundary		Fwy	\$ 100		LADOT - RTP
41	LA	San Fernando Valley	Rte 27	Construct HOV lane connector from 101 Fwy to east-west busway		Fwy	\$ 500		LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
<b>Corridor Capacity Improvements</b>									
42	Central Los Angeles	I-5	Glendale Blvd at SR-2	Implement SR-2 terminus improvements at Glendale Blvd and SR-2	Arterial	\$ 25			SRTP I-5 Congested Corridor
43	San Fernando Valley	Osborne St	Widen Osborne St btwn Foothill Blvd and San Fernando Rd for pedestrian safety and improved traffic capacity		Arterial	\$ 12			LADOT - RTP
44	San Fernando Valley	San Fernando Rd	San Fernando Road Sierra Hwy to Sepulveda Blvd/Roxford St. Widen and install reversible lane.		Arterial	\$ 20			LADOT - RTP
45	Central Los Angeles	San Fernando Rd	Widen San Fernando Rd from SR-2 to I-5 to Major or Secondary Highway standard; construct streetscape, lighting, and parking		Arterial	\$ 20			LADOT - RTP
46	San Fernando Valley	San Fernando Rd	Widen San Fernando Rd from Tyburn St to SR-2 to Major Highway standard		Arterial	\$ 10			LADOT - RTP
47	Westside	Sepulveda Blvd	Widen Sepulveda Boulevard btwn Olympic Blvd and Pico Blvd to Major Highway standard		Arterial	\$ 20			LADOT - RTP
48	San Fernando Valley	Sepulveda Blvd	Extend Sepulveda Blvd from Rinaldi St to Roxford St		Arterial	\$ 80			LADOT - Capital Programs
49	North Co Cities	Foothill Blvd	Widen Foothill Blvd btwn Sierra Hwy and Balboa Blvd to increase capacity		Arterial	\$ 10			LADOT - RTP
50	Central Los Angeles	Sunset Blvd	Widen Sunset Blvd btwn Las Palmas and Mansfield from 70' to 78'		Arterial	\$ 8			LADOT - RTP
51	Central Los Angeles	Sunset Blvd	Sunset Blvd - Virgil Ave to Vermont Ave. Widen to increase capacity.		Arterial	\$ 8			LADOT - RTP
52	San Fernando Valley	Burbank Blvd	Burbank Blvd between Balboa Blvd and Sepulveda Blvd. Elevate Burbank Blvd in the flood control basin to avoid closures during rainy season		Arterial	\$ 80			LADOT - RTP
53	Central Los Angeles	Figueroa St	Figueroa St - Cypress Ave to 5 Fwy. Widen to add southbound capacity.		Arterial	\$ 5			LADOT - RTP

City of Los Angeles Department of Transportation  
 Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
54 LA	San Fernando Valley	Chatsworth St	Chatsworth Street - De Soto Ave to Topanga Cyn Blvd. Widen to increase capacity.		Arterial	\$ 6			LADOT - RTP
55 LA	Central Los Angeles	Beaudry Av	Widen Beaudry Avenue to permit northbound left turn lane and to maintain two full-time northbound lanes on Beaudry Ave between Temple and Sunset		Arterial	\$ 20			LADOT - RTP
56 LA	Central Los Angeles	Santa Fe Av	Santa Fe Avenue - 8th Street to Olympic Blvd. Widen to increase capacity and access to I-10 ramps		Arterial	\$ 10			LADOT - RTP
57 LA	Central Los Angeles	Van Ness St	Sunset Blvd at SB 101 off-ramp. Widen Van Ness St from the off-ramp to Sunset Blvd to add a right-turn-only lane		Arterial	\$ 10			LADOT - RTP
58 LA	Central Los Angeles	Melrose Av	Melrose Ave between Vermont Ave and Western Ave. Remove on-street parking; widen to have 1 left-turn lane and 2 through lanes each way with 10-foot sidewalks		Arterial	\$ 20			LADOT - RTP
59 LA	Central Los Angeles	Melrose Av	Widen south side of Melrose Ave btwn Western Ave and US-101 by 10 ft to increase capacity		Arterial	\$ 10			LADOT - RTP
60 LA	Central Los Angeles	Fountain Av	Widen Fountain Ave between Sunset Blvd and Western Ave to increase capacity		Arterial	\$ 20			LADOT - RTP
61 LA	Central Los Angeles	Cahuenga Blvd	Widen Cahuenga Blvd West btwn Highland Ave and Barham Blvd; widen/cantilever over the Fwy to provide two lanes in each direction with pedestrian sidewalk and bicycle lane, and left turn lanes at Mulholland and Oakcrest		Arterial	\$ 20			LADOT - RTP
62 LA	Central Los Angeles	Cahuenga Blvd	Cahuenga Blvd. East. Add a NB lane from Odin St to Barham Blvd.		Arterial	\$ 20			LADOT - RTP
63 LA	Central Los Angeles	Barham Blvd	Widen Barham Blvd between Cahuenga and Burbank City limit to increase capacity		Arterial	\$ 20			LADOT - RTP
64 LA	San Fernando Valley	Riverside Dr	Riverside Dr from Van Nuys Blvd to Sepulveda Blvd - Extend Riverside Dr from Van Nuys Blvd to Sepulveda Blvd		Arterial	\$ 20			LADOT - RTP

City of Los Angeles Department of Transportation  
 Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
65 LA	San Fernando Valley	Van Nuys Blvd	Improve capacity along southbound Van Nuys Blvd SB between Burbank Blvd and US-101		Arterial	\$ 10			LADOT - RTP
66 LA	San Fernando Valley	Hayvenhurst Av	Hayvenhurst Ave between Magnolia Blvd and Ventura Blvd. Widen or realign the juxtouts on the west side to City standards		Arterial	\$ 10			LADOT - RTP
67 LA	San Fernando Valley	Magnolia Blvd	Extend Magnolia Blvd from Hayvenhurst Ave to Libbit Ave. Extend Magnolia Blvd from Haskell Ave to Sepulveda Blvd		Arterial	\$ 40			LADOT - RTP
68 LA	Central Los Angeles	Magnolia Blvd	Widen Magnolia Blvd from Colfax Ave to Laurel Cyn Blvd to increase capacity		Arterial	\$ 10			LADOT - RTP
69 LA	San Fernando Valley	Oxnard St	Extend Oxnard St. from Sepulveda Blvd to Woodley Ave and build a half interchange to northbound I-405		Arterial	\$ 30			LADOT - RTP
70 LA	San Fernando Valley	Victory Blvd	Widen Victory Blvd btwn White Oak Ave and Sepulveda Blvd to add capacity		Arterial	\$ 20			LADOT - RTP
71 LA	San Fernando Valley	Victory Blvd	Widen Victory Blvd from Topanga Canyon Blvd to Desoto Ave to Major Highway Class I standard		Arterial	\$ 20			LADOT - RTP
72 LA	San Fernando Valley	Topanga Canyon Blvd	Widen to provide six through lanes all day between 101 Fwy and 118 Fwy		Arterial	\$ 30			LADOT Capital Programs
73 LA	San Fernando Valley	Mulholland Dr	Widen Mulholland Dr from San Feliciano Dr to Flamingo St to reduce congestion		Arterial	\$ 10			LADOT - RTP
74 LA	San Fernando Valley	Sepulveda Blvd	Widen/restripe Sepulveda Blvd from Rinaldi St to Mulholland Tunnel to provide peak hour reversible lanes		Arterial	\$ 20			LADOT - Capital Programs
75 LA	San Fernando Valley	Alvarado St	Widen Alvarado St (SR-2) under US-101 to create a SB left turn lane onto EB US-101 on-ramp		Fwy	\$ 10			101 Corridor Study - LA City
76 LA	San Fernando Valley	Sherman Way	Sherman Way Capacity Improvements		Arterial	\$ 20			101 Corridor Study - MTA
77 LA	San Fernando Valley	Polk St	Polk St	Polk St - Widen between Borden Av & Eldridge Av (near I-210) to provide left turn pockets.	Arterial	\$ 1			LADOT Capital Programs

**City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists**

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
78 LA	San Fernando Valley	Penrose St	Penrose St - Tujunga St to Glenoaks Blvd -	Widen to secondary hwy standards to provide 2 through lanes plus left-turn channelization in each direction.	Arterial	\$ 10			LADOT Capital Programs
79 LA	San Fernando Valley	De Soto Ave	De Soto Ave/US-101 ramps	De Soto Ave/US-101 ramps - Widen De Soto Ave under fwy bridge to provide more capacity.	Arterial	\$ 10			LADOT Capital Programs
80 LA	San Fernando Valley	Ventura Blvd	Ventura Blvd	Widen between Shoup Av and US-101 freeway SB ramps to provide double LT lanes and two through lanes.	Arterial	\$ 10			LADOT Capital Programs
81 LA	San Fernando Valley	Woodman Ave	Woodman Ave/US-101	Widen street under the 101 freeway bridge to provide dual left-turn lanes for both directions.	Arterial	\$ 10			LADOT Capital Programs
82 LA	San Fernando Valley	Coldwater Cyn Av	Coldwater Canyon Ave between Ventura Blvd & Magnolia Blvd	Remove cut-outs to add one through lane in each direction.	Arterial	\$ 10			LADOT Capital Programs
83 LA	Westside	Sepulveda Blvd	Sepulveda Blvd between Pico Blvd to National Blvd	Widen to Major Hwy Standard and increase number of through lanes from two to three lanes. (Right-of-Way required)	Arterial	\$ 7			LADOT Capital Programs
84 LA	Westside	Sepulveda Blvd	Sepulveda Blvd between National Blvd to Venice Blvd	Widen to Major Hwy Standard and increase number of through lanes from two to three lanes. (Right-of-Way required)	Arterial	\$ 7			LADOT Capital Programs
85 LA	Central Los Angeles	Hollywood Blvd	Hollywood Blvd	Widen EB Hollywood Blvd between Van Ness Ave and US-101 to provide EB left-turn lane to Van Ness Ave.	Arterial	\$ 5			LADOT Capital Programs
86 LA	Central Los Angeles	Spring St	Spring St from Aliso St to Temple St	Widen Spring Street to provide an additional SB lane to improve bus operations and reduce congestion.	Arterial	\$ 2			LADOT Capital Programs
87 LA	Westside	Centinela Ave	Centinela Ave between Short Ave and Jefferson Blvd	Widen to secondary highway standards.	Arterial	\$ 4			LADOT Capital Programs
88 LA	Westside	La Tijera Blvd	La Tijera Blvd between Airport Blvd and La Cienega Blvd	Widen and restripe to provide continuous three through lanes in each direction.	Arterial	\$ 10			LADOT Capital Programs
89 LA	Westside	Aviation Blvd	Aviation Blvd from Arbor Vitae St to Imperial Hwy	Widen and restripe to accommodate three through lanes in each direction.	Arterial	\$ 12			LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
90 LA	Westside	111th St	111 <sup>th</sup> Street from Aviation Blvd to La Cienega Blvd	Widen and restripe to accommodate two through lanes in each direction.	Arterial	\$ 5			LADOT Capital Programs
91 LA	Westside	La Cienega Blvd	La Cienega Blvd from Arbor Vitae St to 111 St	Widen and restripe to accommodate three through lanes in each direction.	Arterial	\$ 10			LADOT Capital Programs
92 LA	Westside	Imperial Hwy	Imperial Hwy between Sepulveda Blvd and Pershing Dr	Widen to provide continuous three through lanes in each direction.	Arterial	\$ 10			LADOT Capital Programs
93 LA	Central Los Angeles	Wilmington Ave	Wilmington Ave between 115th St and Imperial Hwy	Widen and reconstruct roadway from 40' to 60' to provide two through lanes in each direction.	Arterial	\$ 2			LADOT Capital Programs
94 LA	Central Los Angeles	Figueroa St	Figueroa St between 146th St and Redondo Beach Blvd	Widen Figueroa St to major highway standard from 62' to 80' to provide three lanes in each direction	Arterial	\$ 2			LADOT Capital Programs
95 LA	Central Los Angeles	Highland Ave	Highland Ave. and Franklin Ave. Street Improvements - Phase II	Widen the W/S of Highland N/O Franklin Ave.	Arterial	\$ 6			LADOT Capital Programs
96 LA	Central Los Angeles	Sunset Blvd	Sunset Blvd. - Barrington Ave. to Gunston Dr.	Widen both sides of Sunset, install new sidewalks, curbs, gutters, traffic signals, and landscaping.	Arterial	\$ 5			LADOT Capital Programs
97 LA	Central Los Angeles	Wishire Blvd	Wishire Blvd. Widening - Barrington Ave to 405 Fwy	Widen Wishire Blvd. to 86 feet roadway width to provide additional lane in each direction for buses.	Arterial	\$ 26			LADOT Capital Programs
98 LA	San Fernando Valley	De Soto Ave	De Soto Ave. Widening - Ronald Regan Fwy. to Devonshire St.	Widen De Soto to provide curbs, gutters, sidewalks, and provide an additional lane in each direction.	Arterial	\$ 9			LADOT Capital Programs
99 LA	San Fernando Valley	Branford St	Branford St. Widening in Pacoima	Street widening and sidewalk, increase ped safety.	Arterial	\$ 1			LADOT Capital Programs
100 LA	Central Los Angeles	Valley Blvd	Valley Blvd. Corridor Improvements	Improve capacity at railroad crossings through widening, additional lanes, curb improvements, and upgrades in signal and railroad equipment.	Arterial	\$ 7			LADOT Capital Programs
101 LA	San Fernando Valley	Laurel Cyn	Laurel Cyn. Blvd. Widening South of Mulholland Dr.	Widen west side of Laurel Canyon south of Mulholland to provide an additional southbound lane.	Arterial	\$ 10			LADOT Capital Programs
102 LA	San Fernando Valley	Magnolia Blvd	Magnolia Blvd. Widening - Cahuenga Blvd. to Vineland Ave.	St. widening, sidewalk, curb, and gutter.	Arterial	\$ 17			LADOT Capital Programs

City of Los Angeles Department of Transportation  
 Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
103 LA	San Fernando Valley	Burbank Blvd	Burbank Blvd. Widening - Clybourne Ave. to Vineland Ave.	Widening on both sides of street	Arterial	\$ 22			LADOT Capital Programs
104 LA	Central Los Angeles	Anaheim St	Anaheim St. Widening from Farragut Ave. to Dominguez Channel	Widen to major hwy. stds. 4 to 6 lanes	Arterial	\$ 4			LADOT Capital Programs
105 LA	Central Los Angeles	Alameda St	Alameda St. Widening - 7th St. to 101 Fwy.	Reconstruct Alameda Blvd. within the project limits.	Arterial	\$ 23			LADOT Capital Programs
106 LA	Central Los Angeles	Broadway	Brazil St./Broadway & San Fernando Rd. Crossings	Improve traffic flow at Brazil St. crossing through widening, additional traffic lanes, and upgrading both signal and railroad traffic control devices.	Arterial	\$ 13			LADOT Capital Programs
107 LA	Westside	Bundy Dr	Bundy Dr. Widening - Wilshire Blvd. to Santa Monica Blvd.	Widen Bundy Dr. to provide an additional lane in each direction.	Arterial	\$ 8			LADOT Capital Programs
108 LA	San Fernando Valley	Burbank Blvd	Burbank Blvd. Widening - Cleon to Lankershim Blvd	Widen both sides and improve intersections	Arterial	\$ 16			LADOT Capital Programs
109 LA	San Fernando Valley	Moorpark Ave	Moorpark Ave. Widening - Woodman Ave. to Muirietta Ave.	St. widening, street lights, curb & gutter	Arterial	\$ 13			LADOT Capital Programs
110 LA	Central Los Angeles	Beverly Blvd	Beverly Blvd. Widening - Juanita to New Hampshire	Widen Beverly Blvd roadway from 56' to 70'.	Arterial	\$ 7			LADOT Capital Programs
111 LA	San Fernando Valley	San Fernando / Mission	San Fernando Mission Widening - Sepulveda Blvd. to I-5	Widen to 70ft, increase from 2 to 4 lanes, 0.61 mi	Arterial	\$ 8			LADOT Capital Programs
112 LA	Central Los Angeles	North Spring St	North Spring St. Widening - Roundout St. to Baker St.	Widen N Spring St. between Roundout St. and Baker from 44' to an 80' roadway with landscaped medians.	Arterial	\$ 15			LADOT Capital Programs
113 LA	Central Los Angeles	Exposition Blvd	Exposition Park Traffic Circulation Improvements	Street widening and installation of right turn only lanes along major arterial corridors surround Exposition Park.	Arterial	\$ 4			LADOT Capital Programs
114 LA	San Fernando Valley	Haskell Ave	Haskell Ave. Widening - Chase St. to Roscoe Blvd.	Widen both sides of Haskell to provide curbs, gutters, sidewalks, and an additional traffic lanes.	Arterial	\$ 5			LADOT Capital Programs
115 LA	San Fernando Valley	Roscoe Blvd	Roscoe Bl. Widening- Haskell Ave. to 405 Fwy. SB On-Ramp	Widen 160 feet of Roscoe on the south side to create an eastbound right turn only lane to the I-405 fwy.	Arterial	\$ 5			LADOT Capital Programs
116 LA	Central Los Angeles	Western Ave	Western Ave. Widening - Florence Ave. to 80th St. and at Manchester Blvd.	Widen Western Ave. to provide for right and left turn lanes at various intersections within the project limits.	Arterial	\$ 6			LADOT Capital Programs
117 LA	Central Los Angeles	Mission Rd	Mission Rd. Widening - Griffin Ave. to Marengo St.	Widen Mission Road from 60' to 80' roadway.	Arterial	\$ 4			LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
<b>Intersection Widening</b>									
118 LA	San Fernando Valley	Coldwater Cyn Av	Coldwater Cyn Ave At 101 Fwy - Widen to provide dual left-turns to two on-ramps		Arterial	\$ 5			LADOT - RTP
119 LA	Central Los Angeles	Monterey Rd	Monterey Road North of Huntington Dr. Widen and realign intersection, possibly close access to Browne Ave.		Arterial	\$ 10			LADOT - RTP
120 LA	Central Los Angeles	Fletcher Dr	Fletcher Drive At Glendale Blvd. Widen to increase capacity.		Arterial	\$ 10			LADOT - RTP
121 LA	Central Los Angeles	Barham Blvd	Barham Blvd at Cahuenga Blvd. West. Increase intersection capacity.		Arterial	\$ 5			LADOT - RTP
122 LA	Westside	Stocker St	Widen Stocker Street at Victoria Ave to increase capacity		Arterial	\$ 10			LADOT - RTP
123 LA	Westside	Sunset Blvd	Widen Sunset Blvd at La Brea Ave to provide dual left-turn lanes		Arterial	\$ 10			LADOT - RTP
124 LA	San Fernando Valley	Riverside Dr	Widen Riverside Dr at southbound SR-170 off-ramp to provide double right turns onto SB Tujunga Ave (freeway columns are in the way)		Arterial	\$ 20			LADOT - RTP
125 LA	San Fernando Valley	Sierra Hwy / Old Road	Sierra Hwy/Old Road	Sierra Hwy/Old Road - Widen intersection and connect with Balboa Blvd AT SAC to reduce congestion.	Arterial	\$ 1			LADOT Capital Programs
126 LA	San Fernando Valley	Hubbard St	Hubbard St/ Foothill Blvd	Widen to improve capacity & signal operation.	Arterial	\$ 2			LADOT Capital Programs
127 LA	San Fernando Valley	Glenoaks Blvd	Glenoaks Blvd at Sunland Blvd	Widen east side of Glenoaks Blvd to improve capacity.	Arterial	\$ 1			LADOT Capital Programs
128 LA	San Fernando Valley	Canoga Ave	Canoga Ave at Roscoe	Canoga Ave at Roscoe - Widen to add a NB right-turn lane, EB through lane, and WB second left-turn lane.	Arterial	\$ 2			LADOT Capital Programs
129 LA	San Fernando Valley	Shoup Ave	Shoup Ave widening at Vetura Blvd	Widen west side of Shoup Ave from Vetura Blvd to about 170 ft S/O Vetura Blvd and restripe NB Shoup Ave for one LT, one Through, and one RT/Through at the intersection. (Right-of-Way required)	Arterial	\$ 2			LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

	City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
130	LA	San Fernando Valley	Beverly Glen Blvd	Beverly Glen Blvd and Mulholland Dr	Widen south leg of Beverly Glen Blvd to create a right turn only lane.	Arterial	\$ 10			LADOT Capital Programs
131	LA	Central Los Angeles	Crenshaw Blvd	Crenshaw Blvd & I-10 WB on-ramp	Widen SB Crenshaw Blvd to provide a SB right turn only lane and redesign the WB off-ramp to reduce congestion and improve intersection operation.	Arterial	\$ 6			LADOT Capital Programs
132	LA	Central Los Angeles	Vermont Ave	Vermont Ave from Washington Blvd to I-10 WB off-ramp	Widen 10' on east-side of Vermont Ave to provide LT lane.	Arterial	\$ 6			LADOT Capital Programs
133	LA	Central Los Angeles	Franklin Ave	Franklin Ave/Cahuenga Blvd	Widen to add a second WB right-turn only lane and add a right-turn signal.	Arterial	\$ 5			LADOT Capital Programs
134	LA	Central Los Angeles	Temple St	Temple St between SR-110 Fwy and Grand Ave	Widen to increase capacity by providing additional through lanes.	Arterial	\$ 3			LADOT Capital Programs
135	LA	Central Los Angeles	Santa Fe Ave	Santa Fe Ave/Porter St intersection	Widen intersection to improve truck movement at curb returns.	Arterial	\$ 1			LADOT Capital Programs
136	LA	San Fernando Valley	Roxford St	Roxford St. Widening at Sepulveda Blvd.	Widen curb radius for trucks. Sidewalk, curb and gutter improvements.	Arterial	\$ 2			LADOT Capital Programs
137	LA	San Fernando Valley	Foothill Blvd	Foothill Blvd. and Sierra Hwy. Intersection Improvements	Widen Foothill Blvd. at Sierra Hwy. by 40 ft. for an exclusive left-turn lanes, through lanes and dual free right-turn lanes and integrate traffic signal with the ATCS.	Arterial	\$ 5			LADOT Capital Programs
138	LA	San Fernando Valley	Roxford St	Roxford St. & 210 Fwy. Ramps improvements	Improve I-210 Freeway access at Roxford by providing additional southbound right turn and left turn lanes; and an additional westbound left turn lane from the off-ramp.	Arterial	\$ 1			LADOT Capital Programs
139	LA	Central Los Angeles	Anaheim St	Anaheim St./ Gaffey St./Palms Verdes Dr. Intersection Improvement (Roundabout for 5 Points)	Create a roundabout for a five legged intersection in the Wilmington area.	Arterial	\$ 12			LADOT Capital Programs
140	LA	San Fernando Valley	Balboa Blvd	Balboa Blvd. Widening at Devonshire St.	Widen east side of Balboa for approximately 500 feet and restripe the intersection.	Arterial	\$ 2			LADOT Capital Programs
141	LA	San Fernando Valley	Coldwater Cyn Av	Coldwater Cyn Ave At Mulholland Dr. (West Intersection)	Widen Coldwater and Mulholland to improve capacity.	Arterial	\$ 5			LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
<b>Bridges</b>									
142 LA	Central Los Angeles	Barham Blvd	Widen Barham Blvd Bridge at Hollywood Fwy to increase traffic capacity that matches a street widening project programmed in 2001 CFP		Arterial	\$ 10			LADOT - RTP
143 LA	Central Los Angeles	Los Angeles St	Los Angeles St Bridge over US-101: Replace with longer bridge for increased lateral underclearance; cover NB on-ramp with a portal frame for increased open space for proposed park		Arterial	\$ 8			LADOT - RTP
144 LA	San Fernando Valley	Colfax Ave	Replace Colfax Ave bridge over LA River with signature span and widen to Ventura Blvd		Arterial	\$ 5			LADOT - RTP
145 LA	Central Los Angeles	Grand Ave	Widen Grand Ave bridge between Cesar Chavez and Temple St over US-101 to improve access to US-101 and 110 on-ramps	Widen the existing bridge to allow dual left-turn lane to 101 & 110 on-ramps, and add thru lane and right-turn lane. Widen sidewalk for future school and Grand Plaza access and study repalcement alternative.	Arterial	\$ 18			LADOT - RTP
146 LA	Central Los Angeles	Hyperion Ave / Glendale Blvd	Widen Hyperion Ave/Glendale Blvd bridge over I-5 Fwy to include bike lanes, shoulders, and sidewalks		Arterial	\$ 100			LADOT - RTP
147 LA	Central Los Angeles	College St	College St. Bridge Over 110 Fwy. Replace with wider bridge to improve capacity. Raise the superstructure to resolve underclearance deficiency.		Arterial	\$ 6			LADOT - RTP
148 LA	San Fernando Valley	Tujunga Ave	Widen Tujunga Ave Bridge (HBRR project - design complete, construction postponed to FY 2007-08)		Arterial	\$ 10			LADOT - RTP
149 LA	Westside	Lincoln Blvd (SR-1)	Widen Lincoln Blvd bridge over the Ballona Creek, including reconstruction of the Culver Blvd bridge over Lincoln Blvd		Arterial	\$ 50			LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
150 LA	Central Los Angeles	Barham Blvd	Barham Blvd Bridge/US 101 Fwy Bridge Replacement	Replace the existing bridge to increase traffic capacity, and widen/restripe SB US-101 off-ramp at Barham Blvd to provide SB double left turns.	Arterial	\$ 30			LADOT Capital Programs
151 LA	Central Los Angeles	State St	State St between Marengo St and City View Ave	Widen the long bridge over I-10 freeway to accommodate two lanes in each direction with left turn channelization.	Arterial	\$ 50			LADOT Capital Programs
152 LA	Central Los Angeles	Fletcher St	Fletcher St Bridge/LA River	Widen to increase capacity and improve access to I-5 Fwy. Also add bike lanes and sidewalks.	Arterial	\$ 6			LADOT Capital Programs
153 LA	Central Los Angeles	Exposition Blvd	Exposition Blvd/Ballona Crk	Widen existing bridge to remove bottlenecks and deficiencies.	Arterial	\$ 10			LADOT Capital Programs
154 LA	Central Los Angeles	Sixth St	Sixth St Viaduct Over LA River and US-101 Fwy.	Reconstruct Bridge due to material defects	Arterial	\$ 16			LADOT Capital Programs
155 LA	San Fernando Valley	Riverside Dr	Riverside Dr. Overcrossing at SR-134	Widen the bridge to accommodate a median left turn lane onto westbound SR134, new shoulder/bike route on each side, and wider sidewalks. Construct the new traffic signals to improve traffic progression.	Arterial	\$ 8			LADOT Capital Programs
156 LA	Central Los Angeles	Forest Lawn Dr	Forest Lawn Dr. Bridge Over LA River	Construct an access bridge (incl. equestrian trail) over LA River at LAEC. Re-align SR 134 on/off ramps at Forest Lawn Dr. to enhance traffic flow in and around the new bridge.	Arterial	\$ 8			LADOT Capital Programs
<b>Tunnels and Grade Separation</b>									
157 LA	San Fernando Valley	Sepulveda Blvd	Sepulveda Blvd Tunnel at Mulholland Bridge. Widen existing tunnel to provide additional bike and traffic lanes.		Arterial	\$ 30			LADOT - RTP
158 LA	San Fernando Valley	Salicoy St	Build a tunnel on Salicoy St underneath the Van Nuys Airport between Woodley St and Hayvenhurst Ave		Arterial	\$ 50			LADOT Capital Programs

**City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists**

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
159 LA	San Fernando Valley	Saticoy St	Saticoy St. between Van Nuys Blvd and Woodman Ave - Construct grade separation between street and RR tracks for improved safety.		Arterial	\$ 80			LADOT - RTP
160 LA	Central Los Angeles	N. Main St	N. Main St Grade Separation with LA River/Metrolink/Union Pacific Railroad		Arterial	\$ 50			LADOT Capital Programs
161 LA	San Fernando Valley	Sunland Blvd	Construct grade separation on Sunland Blvd near San Fernando Rd		Arterial	\$ 40			LADOT Capital Programs
162 LA	Westside	Sepulveda Blvd	Construct grade separation (underpass) at the Sepulveda Blvd and Wilshire Blvd intersection		Arterial	\$ 40			LADOT Capital Programs
163 LA	Central Los Angeles	El Monte Busway	Provide grade separation at Alameda St for direct access of transit buses from Downtown LA to El Monte Busway		Arterial	\$ 60			LADOT Capital Programs
164 LA	Westside	La Cienega Blvd	Construct grade separations on La Cienega Blvd at Jefferson Blvd, Rodeo Blvd, La Tijera Blvd, and Manchester Blvd to improve travel time along La Cienega between I-10 and LAX area.		Arterial	\$ 120			LADOT Capital Programs
165 LA	Westside	Lincoln Blvd (SR-1)	Lincoln Blvd/Washington Blvd	Build a grade separation to reduce congestion.	Arterial	\$ 50			LADOT Capital Programs
166 LA	Central Los Angeles	Broad Ave	Broad Ave from Harry Bridges Blvd to Water St	Build grade-separated access to waterfront area from rail lines, extend Broad Ave to Water Street, and install bike lanes and sidewalks on both sides of Broad Ave	Arterial	\$ 20			LADOT Capital Programs
167 LA	Central Los Angeles	Navy Way	Navy Way at Seaside Ave (SR-47)	Build a new flyover connector from NB Navy Way to WB Seaside Ave	Arterial	\$ 40			LADOT Capital Programs
168 LA	San Fernando Valley	Laurel Canyon Blvd	Laurel Canyon Bl/La Cienega Bl between US-101 and I-10 - Build a tunnel to connect US-101 and I-10 (approx. 10 miles)		Arterial				LADOT Capital Programs
169 LA	Central Los Angeles	SR-2	SR-2 from I-5 to SR-110 - Build a tunnel under Glendale Blvd connecting from I-5 through US-101 to SR-110		Arterial				LADOT Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
<b>Rail</b>									
170	LA Co, Montebello, Pico Rivera, Whittier	Central Los Angeles, Gateway	East LA Corridor	Eastside Gold Line -extend from Atlantic to Norwalk/Whittier	Transit	\$ 671			2001 LRTP Strategic Plan
171	Culver City, LA, Santa Monica	Westside Cities, Central Los Angeles	I-10	Exposition Light Rail Transit: Phase I - Downtown to Culver City	Transit	\$ 640	2006	2009	SRTP I-10 Congested Corridor
172	LA, Culver City, Santa Monica	Central Los Angeles, Westside Cities	I-10	Exposition Light Rail Transit: Phase II - Culver City to Santa Monica	Transit	\$ 600			Westside Mobility Study
173	LA, LA Co	Central Los Angeles	Vermont Corridor	Metro Green Line - I-105 to Hollywood Blvd along Vermont Ave	Transit	\$ 373			2001 LRTP Strategic Plan
174	LA, Glendale	Central Los Angeles	Alameda Corridor North	Alameda Corridor North - between SR-2 and SR-134. Grade separation (trench) for commuter and freight rail lines	Transit	\$ 1,000			LADOT Capital Programs
175	LA	San Fernando Valley	Red Line	Extend Red Line from N. Hollywood to Sylmar	Transit	\$ 500			LADOT Capital Programs
176	LA	Westside	Green Line	Extend Green Line from LAX to City of Santa Monica	Transit	\$ 1,000			LADOT Capital Programs
177	LA	Westside	I-405	Build Rail Connection from LAX to Sylmar along 405 Fwy	Transit	\$ 2,000			LADOT Capital Programs
178	LA	Westside	Florence Ave / BNSF	Build rail to connect Harbor and Crenshaw Corridors to LAX utilizing existing BNSF rail line	Transit	\$ 1,000			LADOT Capital Programs
<b>Metro Bus</b>									
179	LA, Santa Monica	Westside Cities, Central Los Angeles	I-10	SR-1 to I-5 parallel to I-10	Transit	\$ 20			SRTP I-10 Congested Corridor
180	Burbank, Glendale, LA, Lancaster, Palmdale, Santa Clarita, San Fernando	North Co Cities, SFV, Central Los Angeles	I-5	Various locations to be determined	Transit	\$ 5			SRTP I-5 Congested Corridor

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
181 LA	Central Los Angeles, Gateway, Arroyo Verdugo, SFV	I-5	Various locations to be determined	Increase transit services throughout the I-5 corridor	Transit	\$ 50			SRTP I-5 Congested Corridor
182 LA	SFV, Central Los Angeles	US -101	Add local community transit service connections to Red Line stations btwn US-101/SR-134/SR-170 interchange and Downtown LA: Hollywood/Western (2 routes), Vermont/Santa Monica/LACC (3 routes), Vermont/Beverly (5 routes), Westlake/MacArthur Park (3 routes)		Transit	\$ 50			101 Corridor Study - MTA
183 LA	SFV, Central Los Angeles	US -101	Increase Metrolink services b/w Moorpark and Union Station		Transit	\$ 5			101 Corridor Study - MTA
184 LA	San Fernando Valley	US-101	Add Planned North-South Busway Project		Transit	\$ 100			101 Corridor Study - MTA
<b>DASH</b>									
185 LA	Central Los Angeles, San Fernando Valley, Westside	I-5, I-10, US-101, I-405, I-110, SR-170	10 new DASH routes Citywide	\$18 M Capital, \$45 M Operating	Transit	\$ 63	2005	2015	LADOT - Transit
<b>TSM/TDM</b>									
<b>TSM</b>									
186 LA	Westside Cities, Central Los Angeles, San Gabriel Valley, San Fernando Valley	Citywide	Vehicle Infrastructure Integration - to integrate vehicle navigation system with Intelligent Transportation System (ITS)		TSM/TDM	\$ 10			LADOT

City of Los Angeles Department of Transportation  
 Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
187 LA	Central Los Angeles, San Fernando Valley	North San Fernando Valley, South Central Los Angeles	Complete Citywide ATSAC system		TSM/TDM	\$ 80			LADOT
188 LA	Westside Cities, Central Los Angeles, San Fernando Valley, San Gabriel Valley	Citywide	Restripe various arterials for turn pockets and additional lanes. Arterial reconfiguration to facilitate directional flow such as reversible lanes.		TSM/TDM	\$ 50			SRTP I-10 Congested Corridor
<b>TDM - Ridesharing</b>									
189 LA	Central Los Angeles, Gateway, Arroyo Verdugo, SFV	Citywide	Create a Transportation Management Association to champion TDM programs		TSM/TDM	\$ 5			SRTP I-5 Congested Corridor
190 LA	Central Los Angeles, Westside Cities, San Fernando Valley, San Gabriel Valley	Citywide	Add/expand park-and-ride facilities		TSM/TDM	\$ 50			SRTP I-5 Congested Corridor
<b>TDM - Bicycles/Pedestrians</b>									
191 LA	Westside Cities, Central Los Angeles, San Gabriel Valley	Citywide	Enhance/expand/coordinate pedestrian, bicycle, and transit information and amenities		TSM/TDM	\$ 50			SRTP I-10 Congested Corridor
192 LA	Central Los Angeles	US-101	Decking over 101 Fwy between Bronson Ave and Vermont Ave for pedestrian linkage and open space		TSM/TDM	\$ 100			LADOT - Capital Programs

City of Los Angeles Department of Transportation  
Additional Projects for SCAG's RTP/Strategic Plan Project Lists

City	Subregion	Route	Project Limits/Description	Description 2	Roadway Type	Project Est. Cost (millions)	Project Est. Start Date	Project Est. Completion Date	Reference Document/Corridor Study
<b>GOODS MOVEMENT</b>									
<b>Freeways</b>									
193	Bell, Bell Gardens, Commerce, Compton, Long Beach, Lynwood, Monterey Park, Paramount, South Gate, Vernon	I-710	I-405 to I-10	Add truck lanes to I-710 between I-405 and I-10	Fwy	\$ 2,000	2010	2030	SRTP I-710 Congested Corridor
194	San Fernando Valley	I-5	SB I-5 between SR-14 freeway and I-210 freeway	Widen the truck route to add a third truck lane and extend the truck route to I-405.	Arterials/ Goods Movement	\$ 20			LADOT Capital Programs
195	Central Los Angeles	I-10	WB I-10 off-ramp at Mateo St	Improve curb returns to improve truck movement. (Right-of-Way Required)	Arterials/ Goods Movement	\$ 2			LADOT Capital Programs
<b>Arterials</b>									
196	Central Los Angeles	Alameda St	Alameda St Widening and Reconstruction btwn US-101 and 26th St	Rebuild street and repave to heavy duty vehicle standards; install channelization and widen curb returns to facilitate truck movements btwn US-101 and 26th St	Arterials/ Goods Movement	\$ 30	2010	2020	LADOT - RTP
197	San Fernando Valley	Roxford & Sepulveda	Capacity Enhancements and ramp improvements at Roxford St/Sepulveda Blvl-5	Widen and signalize Roxford Street/Sepulveda Blvd at I-5 to facilitate truck movements	Arterials/ Goods Movement/Fr	\$ 5	2010	2020	LADOT - RTP
198	Central Los Angeles	San Fernando Rd West	Capacity Enhancements at San Fernando Rd West/Brazil St and San Fernando Rd West/Doran St	Widen and improve north and south sides of Brazil St and Doran St to create additional lanes, curb and gutter in each direction; increase curb returns to facilitate truck movements	Arterials/ Goods Movement	\$ 5	2010	2020	LADOT - RTP
199	Central Los Angeles	Main & Daly	Capacity Enhancement at Daly St and Main St	Increase curb returns at NW and SW corners of Daly and Main to facilitate truck movements	Arterials/ Goods Movement	\$ 2	2010	2020	LADOT - RTP
200	Central Los Angeles	Enterprise St	Enterprise St at Mateo St (near WB I-10 off-ramp)	Widen Enterprise St at Mateo St (near WB I-10 off-ramp) to improve truck movement at curb returns.	Arterials/ Goods Movement	\$ 1			LADOT Capital Programs
201	Central Los Angeles	Olympic Blvd	Olympic Blvd at Alameda St	Widen to improve truck movement (Right-of-Way required)	Arterials/ Goods Movement	\$ 3			LADOT Capital Programs

## **Additional Technical Corrections**

### **To Draft 2008 Regional Transportation Plan Submitted by Dept. of Transportation City of Los Angeles**

#### **Main RTP Document**

- Table 3.1 of main document (HOV and HOV Connector Projects) : the I-5 / I-405 connector has a listed implementation date of 2030; however the Caltrans District 7 2007 HOV Annual Report lists the project completion date as 2016.

#### **Los Angeles County TCM's Subject to Timely Implementation**

- Project LA002738 – Change completion date to 2010
- Project LA0C8164 – Change completion date to 2010; add note that Exposition Light Rail Construction Authority will be implementing entity.
- Project LAOB7330 – No comment/changes
- Project LA0C8171 – Project cancelled
- Project LAOC8173 – Change completion date to 2008; Design complete; bid/advertise phase
- Project LAOC8209 - Change completion date to 2009; Project in construction
- Project LAOC8242 - No comment/changes
- Project LA974165 – No comment / changes
- Project LAE0566 – LAWA Project
- Project LAEO567 - LAWA Project

#### **RTIP Projects**

- SFV North-South BRT Extension Phase I: Metro Rapid on Reseda & Sepulveda (\$102 million) - **If this is the TCRP-designated Valley North-South BRT Project, available funding is now under \$100 million; add Van Nuys Bl. and San Fernando Rd./Lankershim Bl.; should be combined with other SFV North-South BRT Extension Phases; modify**

**entry in Table 2 (Major Transit Projects) in Transit Report to reflect full scope of project (page 38)**

- SFV North-South BRT Extension Phase II: Bus Speed Improvements on Metro Rapid Corridors & Park & Ride Facility (\$0) – **same comment as for Phase I (page 38)**
- SFV North-South BRT Extension Phase III: Station Accessibility & Ped Enhancements on Reseda, Sepulveda & Lankershim (\$0) - **same comment as for Phase I (page 38)**
- SFV North-South BRT Extension Phase IV: Northbound Bus Lane on Sepulveda (\$0) - **Note: LA City has not approved bus lanes on Sepulveda. Same comment as for Phase I (page 38)**
- SFV East-West BRT from North Hollywood to Warner Center (\$21 million) - **Delete; project completed (page 38)**
- Mid-City Transit Corridor: Wilshire from Vermont to Santa Monica Downtown - Wilshire BRT (\$133 million) - **OK, but change from “Vermont” to “Western” and modify entry in Table 2 (Major Transit Projects) in Transit Report accordingly (page 38)**
- **ADD: Olympic Bl & Mateo St Goods Movement Improvement Phase II - (\$4 million; funded in 2007 Call and entered into FTIP by LADOT)**

### RTP Projects

- Canoga Transitway from Warner Center to Chatsworth (\$150 million) - **OK; add to Table 3 (Transit Corridor Projects) in Transit Report (page 94)**
- Metro Purple Line Westside Extension from Western to La Cienega (**revise to \$2.3 billion per Metro**) (page 94)

### Strategic Plan Projects

- Metro Rapid Bus service expansion in LA City - **OK; add to discussion of Strategic Plan in Transit Report (page 198)**
- **ADD: East Downtown Truck Access Improvements Phase II - Complete capacity enhancements at four locations in Downtown LA to improve truck access and safety: Olympic Bl. at Alameda St., 16<sup>th</sup> St. At Central Ave., 14<sup>th</sup> St. at Alameda St., San Pedro St. at 18<sup>th</sup> St.**

- **ADD:** Port Access Improvements - Improve unimproved Lomita Bl. ROW between Wilmington Ave. and Alameda St. to Major Highway Class II standards to provide truck access between intermodal facilities and Alameda Corridor; improve Alameda St. roadway between Henry Ford Ave. and Anaheim St. to Major Highway Class II standards
- **ADD:** Northeast LA Truck Access Improvements - Capacity enhancement on Brazil St. between San Fernando Rd. West and San Fernando Rd. East to reduce truck congestion and gridlock over railroad tracks; capacity enhancement at Main St. and Daly St. to improve truck access between UP/SP railyard and I-5; install signal on San Fernando Rd. at Tyburn St. To improve truck safety and reduce congestion on San Fernando Rd. (with City of Glendale)

### **Transportation Conformity Report**

- Project ID LAE0566 (expansion of LAX remote terminal flyaway shuttle bus system): project status needs to be modified to reflect the fact that LAWA now operates flyaway shuttles from Union Station (UPT) to LAX and from Westwood to LAX
- Project ID LA000274 (Santa Monica Transit Parkway): Project Status should indicate that this project has been completed by the City.



February 19, 2008

File Number: 4000100

MEMBER AGENCIES

California Department of  
Transportation  
Los Angeles County Metropolitan  
Transportation Authority  
North San Diego County  
Transit Development Board  
Orange County  
Transportation Authority  
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Southern California  
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Union Pacific

STAFFED BY:

SANDAG  
401 B Street, Suite 800  
San Diego, CA 92101  
Phone: (619) 699-1900  
Fax: (619) 699-1905  
lossan@sandag.org

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

Dear Ms. Meaney:

SUBJECT: Los Angeles to San Diego (LOSSAN) Rail Corridor Agency  
Comments on Southern California Association of Government's  
(SCAG) Draft 2008 Regional Transportation Plan (RTP)

On behalf of LOSSAN, thank you for the opportunity to comment on the Draft  
2008 RTP. The LOSSAN Board of Directors met on February 6, 2008, and has  
these comments:

- o Overall, we are disappointed in the lack of inclusion for the LOSSAN Corridor and its passenger rail services, Amtrak's Pacific Surfliner intercity rail service, and Metrolink commuter rail service in the financially constrained plan. It is ironic that the front page of your Executive Summary is a photograph of one of the region's passenger rail stations.
- o We made a similar comment on SCAG's 2004 RTP and it was our understanding that this would be addressed in future updates. We are disappointed that it has not.
- o The LOSSAN Corridor is the second busiest rail corridor in the nation. Each of our passenger rail operators continues to experience record ridership levels. Metrolink estimates that commuter rail ridership alone accounts for one lane of the busy Interstate 5 freeway. Rail is an integral piece of Southern California's transportation system.
- o The RTP goals include Mobility, Accessibility, Air Quality, Energy Efficiency, and Linking Land Use and Transportation Decisions. We feel that including alternatives to driving alone such as passenger rail service is key to meeting your goals.
- o SCAG is a member of LOSSAN, and in fact, was instrumental in the agency's startup in 1989. Furthermore, staff and board members are familiar with advocacy for passenger rail service and therefore, passenger rail should have been addressed in the Draft 2008 RTP.

- o The Draft 2008 RTP covers the region's freight systems in detail, yet our rail corridor is shared by both passenger rail and goods movement. Improvements made by one of these operators benefits the other. This synergy should be discussed at the same level as freight.
- o Lastly, consider a glossary of terms, including a definition of LOSSAN and a list of transportation agencies of which SCAG is a member such as LOSSAN.

LOSSAN members are rail owners and operators, regional transportation planning agencies, and metropolitan planning organizations along the 351-mile coastal rail corridor. Since 1989, LOSSAN has advocated for improvements to the corridor that have benefited freight and intercity and commuter rail ridership. Investments have been made at all levels and should be highlighted in the Draft 2008 RTP. The voters directed major investments in our rail services in the early 1990s and recently with Proposition 1B.

Thank you for the opportunity to comment. Should you have any questions, please contact Linda Culp, San Diego Association of Government's staff to LOSSAN, at (619) 699-6957 or [lcu@sandag.org](mailto:lcu@sandag.org). We look forward to changes for the final RTP.

Sincerely,



HONORABLE ART BROWN  
LOSSAN Chair

DVE/LCU/ama

cc: LOSSAN Member Agencies



# Metro

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

**Roger Snoble**  
*Chief Executive Officer*  
213.922.6888 Tel  
213.922.7447 Fax  
metro.net

February 15, 2008

Hasan Ikhata, Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) Draft 2008 Regional Transportation Plan (RTP). We would like to compliment SCAG on the inclusive process that was undertaken to develop the draft RTP. In general, we find the document to be well written in identifying many of the key challenges facing our region through 2035. We request that the following comments be addressed in developing the final 2008 RTP.

1. In January, the Metro Board was briefed on preliminary recommendations for Metro's draft 2008 LRTP. That briefing included a presentation on our updated financial model, which has been revised to reflect expected increases in project construction costs as well as the impact of the State funding shortfall. SCAG should be aware that Metro does not anticipate adding any new projects in the draft 2008 LRTP, and the schedule of some existing projects may be impacted. Metro's planning staff will coordinate with SCAG planning staff and provide you with our latest financial assumptions, as well as project, cost, and scheduling assumptions.
2. The draft 2008 LRTP identifies various projects that have not been approved by the Metro Board through the 2001 LRTP. We note that Metro anticipates releasing its draft 2008 LRTP in March 2008 and adopting a final 2008 LRTP in June 2008. As a result, SCAG should be aware that it may need to amend its RTP to reflect Metro's adopted LRTP at some future point. We note that there is precedent for such amendments, as the 2004 RTP was recently amended to incorporate CMIA projects funded through the State Bond. Projects not included in Metro's Constrained LRTP to date include the following:
  - I-710 Truck Lanes between ports and SR-60
  - I-710 Tunnel from I-10 to I-210
  - High Desert Corridor connecting LA and San Bernardino
  - I-5 Carpool and Truck Climbing Lanes in Santa Clarita
  - I-5 Carpool Lanes from SR 19 (Rosemead Blvd) to I-710
  - Regional Connector
  - Green Line LRT Extension

- Gold Line Extension to Montclair
  - Purple Line Extension to Western and La Cienega
  - High Speed Rail System
  - Rail Capacity Improvements (Tier 4 engines, grade separations, capacity improvements)
  - Orangeline Maglev Project in Southeastern Los Angeles County and Orange County
3. Through the review and adoption of the Air Plan, Metro provided comments regarding rail electrification and Tier 4 locomotives, which were assumed to be funded and implemented by 2014. Metro expressed its concern as to whether these programs could be accomplished by that deadline. SCAG should clarify whether these proposals are still included in the draft RTP. We remain concerned that SCAG not commit to these strategies or others, that cannot realistically be attained on schedule and would put the region at risk for air quality sanctions and the loss of federal transportation dollars.
  4. We have reviewed SCAG's demographic forecast for Los Angeles County and have noted that population and employment is decreasing in comparison to the 2004 RTP, in various corridors where major transit facilities are planned. We are concerned that these reductions are not consistent with SCAG's stated goal to encourage development along transit corridors, and we would seek revisions to growth forecasted for these corridors.
  5. We recommend that the RTP section on Transit Operations (page 95-97) be deleted, as service operational policies are the responsibility of transit operators collectively and individually, rather than related to the regional planning responsibility of SCAG through the RTP. We note that many of the recommendations in this section have already been implemented by Metro in conjunction with Los Angeles County municipal transit operators, and it would be counter-productive to revisit or duplicate programs that are well into implementation. For instance, Metro has just adopted its transit service policies, has implemented its Advanced Passenger Count ITS based passenger data collection system, has implemented an EZ Pass for fare coordination with over 20 Los Angeles County transit operators, is implementing its Transit Access Pass (TAP) universal fare program, and has evaluated ways to improve service efficiency, effectiveness, and connectivity through its Metro Connections effort over the last several years. We do not recommend that SCAG seek FY 08-09 funding for activities listed in the Transit Operations section, as they have been extensively explored and are the responsibilities of the transit operators rather than SCAG. We also note that it is inconsistent to focus on transit operational policies in the RTP, when operational policies are not addressed for highways, arterials, or other modes. Rather than focusing on transit operational issues that are beyond the purview of the RTP, we would encourage SCAG to focus on a very important regional issue which is an impediment to expanding both transit service and transit ridership – the lack of funding for both transit capital and operating needs.

6. It is our understanding that SCAG did not include its MAGLEV proposal in its air quality conformity analysis and that conformity was attained without this project. This is consistent with the 2004 RTP, which listed the MAGLEV in its constrained program but did not assume air quality credit for it. We recommend that this practice be continued for the 2008 RTP. We would also like to see the RTP confirm that this project is fully funded through private funds, and that Metro has no financial obligation.
7. We will work with SCAG staff to ensure that SCAG is aware of our LRTP schedules for Los Angeles County transportation projects. It is important for air quality conformity purposes that the RTP project schedules to be consistent with Metro's project schedules. We need to avoid the need to go through the air quality substitution process that happened to Metro on the Red Line and to OCTA on the Centerline project.
8. Attached to this letter are additional comments on specific elements of the draft RTP.

Thank you for the opportunity to comment on the draft RTP. Metro looks forward to working with SCAG in addressing these comments. If you have any questions, please contact Brad McAllester at 213-922-2914.

Sincerely,



Roger Snoble  
Chief Executive Officer

## ADDITIONAL COMMENTS ON DRAFT 2008 RTP

- Page 13, SCAG states that an additional \$10B is needed for arterial and transit related system preservation needs through 2035 (27years from now). Metro's latest survey includes an unfunded backlog of \$9.9 B for Los Angeles County for every road and type of system preservation – 3R, Maintenance for Arterials and Local Streets. System preservation needs for arterials are estimated at approximately \$5.4 B for arterials comprised of:

\$1.2 B for Arterial 3R unmet backlog

\$2.8 B for annual Arterial 3r unmet cost to maintain backlog for 27 years

\$0.167B of unmet maintenance backlog

\$1.2B for annual Arterial maintenance Unmet cost to maintain for 27 years.

There is another \$4.5B of system preservation needs on local streets (maintenance and 3R).

- Projects in the Pipeline (p. 97): 5/14 HOV connector will be in construction shortly, and others such as 5/170, 57/60, 405/605, etc. are not even in the strategic element of our LRTP. In addition, I-405 HOV gap closure in the Westside of LA (1<sup>st</sup> bullet), I-5 and SR-14 (3<sup>rd</sup> bullet), I-5 and I-605 (4<sup>th</sup> bullet), I-10 and SR-60 (5<sup>th</sup> bullet) and US-101 (7<sup>th</sup> bullet) are all too broad and are in need of better clarification.
- The RTP references a Major Corridor Study that has been completed for SR-60. Metro is not aware of this Study. The Multi-County Goods Movement Action Plan (MCGMAP) considered preliminary criteria and conducted modeling to identify an East/West freight corridor. The final recommendation of the MCGMAP, however, is that further analysis of parallel East/West corridors needs to take place with consideration given to both alternative technologies and potential East/West non-freeways corridors.
- Metro is pleased to see SCAG's inclusion of alternative technology methods for moving goods.
- On page 104, under Transit Strategies, the first sentence of the second paragraph should be revised to read:

The goals of public transportation services are to ensure mobility for people without access to automobiles, and to provide attractive alternatives for drive-alone motorists or discretionary riders, and to promote land use development that relies less heavily on drive-alone automotive access.

- On page 105, in the Transit Expansion section under "Projects in the Pipeline", the Wilshire Blvd/Mid-City Transit Corridor (Vermont to Santa Monica) in LA County should be renamed as "Wilshire Metro Rapidway in LA County".

- Table 3.5, Transit Corridor Projects, page 108 the “Purple Line Extension (Wilshire/Western to La Cienega)” should be revised as “Westside Extension (Metro Purple/Red Line Extension)”.
- Aviation Section, pages 108 – 111. The Aviation Decentralization Strategy seems to rely too heavily on the implementation of a very speculative High Speed Regional Transportation (HSRT) system. If such a system is not implemented, there is no backup strategy for getting people to highly decentralized airports.

At a minimum, the plan should spend some time describing a more conventional regional rail network that could be developed along existing rail corridors that link the regional airports. Operators such as Metrolink and Amtrak operate along these routes and could provide reasonably direct airport service in the event that the High Speed Regional Transportation System proves to be infeasible.



**Board Members:**

**Jon Blickenstaff**  
Chair  
Mayor, City of  
La Verne  
Appointee of  
San Gabriel Valley  
Council of  
Governments

**Vivien Bonzo**  
Vice Chair  
Appointee of  
Los Angeles County  
Metropolitan  
Transportation  
Authority

**Rob Hammond**  
Member  
Mayor, City of  
Monrovia  
Appointee of  
City of  
Pasadena

**Keith Hanks**  
Member  
Council Member,  
City of Azusa  
Appointee of  
City of  
South Pasadena

**Ed P. Reyes**  
Member  
Council Member,  
City of Los Angeles  
Appointee of  
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Mayor, City of  
Pasadena  
Appointee, City of  
Pasadena

**Lara Larramendi**  
Member, Non- Voting  
Gubernatorial  
Appointee

**Daniel M. Evans**  
Member, Non-Voting  
City of  
South Pasadena  
Appointee, City of  
South Pasadena

**Executive Officer:**

**Habib F. Balian**  
Chief Executive Officer

February 14, 2008

BLCA-3RD-493

Ms. Jessica Meaney  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

Dear Ms. Meaney:

On behalf of the Metro Gold Line Foothill Extension Construction Authority, I wish to express our appreciation for the inclusion of the Foothill Extension light rail project within the 2008 Regional Transportation Plan (RTP). We have experienced tremendous cooperation from your agency in the ongoing development and progress of the Foothill Extension, a project that will fulfill the needs of the San Gabriel Valley for a fully developed mass transit solution to its current and projected congestion challenges, as well as support the overall goals for the RTP.

We are also grateful for the opportunity to provide comments regarding the plan. In particular, we would like to emphasize the value of the Foothill Extension in relation to its land use impact. We are forwarding recent documents generated through our FTA TOD Assessment Grant that should illustrate the immediate and long-term impacts of proposed the 24-mile light rail system. This information includes analyses and/or current land use status for all cities along the proposed light rail corridor.

The following results and observations from our recent TOD Assessment Study effort are indicative of the commitment of the Extension corridor cities to fundamental changes in land use to capture the value of the Foothill Extension:

- Six of the eleven corridor cities have General Plans that specifically recognize the importance of regional transportation (Arcadia, Monrovia, Duarte, Azusa, Glendora, and San Dimas.)
- Nine of the corridor cities have incorporated transit-oriented development concepts in redevelopment or specific plans which are in place, underway, or contemplated (Arcadia, Monrovia, Duarte, Azusa, Glendora, La Verne, Pomona, Claremont, and Montclair).

- The Study work products included development of TOD concepts and transportation planning to increase the effectiveness of TOD.
  - Five cities completed TOD visualizations to better understand the implications of higher density, mixed use, and other TOD planning principles (Duarte, Irwindale, Glendora, San Dimas, and Pomona).
  - Six cities studied transportation, parking, and circulation to create more effective links between the planned light rail and community resources (Arcadia, Monrovia, Azusa, La Verne, Claremont, and Montclair).
  
- The Study work effort highlighted the importance of transit to achieving local and regional development goals.
  - Six of the corridor cities contemplate an important link between the Gold Line and their redeveloping historic downtowns (Arcadia, Monrovia, Azusa, Glendora, San Dimas, and La Verne).
  - Five of the corridor cities contemplate a connection between the Gold Line and regional destinations (Arcadia, Duarte, La Verne, Azusa, and Claremont).
  - Many institutions along the Gold Line have incorporated a light rail connection into their master planning efforts (City of Hope, Azusa Pacific University, and Citrus College).

The corridor cities' enthusiasm for the Extension is demonstrated by the fact that, as of August 2007, the public sector has invested \$273 million in the form of planning studies and infrastructure to support the Foothill Extension. Even more remarkable is the "pipeline" of private investment and development along the Corridor, estimated to be \$1.8 billion. A summary of public and private investment by each of the Corridor Cities is included in our attachments.

Please feel free to contact me for any additional information or questions.

Sincerely,



Habib F. Balian  
Chief Executive Officer  
(626) 305-7001

Attachments

## Metro Gold Line Foothill Extension Public and Private Investment

City	Project	Private Inv.	Public Inv.	Total
<b>Azusa</b>				
<i>within</i>	Rosedale Development Project - ALP	\$ 600,000,000		\$ 600,000,000
<i>within</i>	Block 36 - Lowe Enterprises	\$ 40,000,000		\$ 40,000,000
—	Azusa General Plan Update (2004)		\$ 2,500,000	\$ 2,500,000
—	Watt Genton's Downtown North	<i>to be determined</i>		
—	North Downtown Plan		\$ 500,000	\$ 500,000
<b>Subtotal</b>		<b>\$ 640,000,000</b>	<b>\$ 3,000,000</b>	<b>\$ 643,000,000</b>
<b>Arcadia</b>				
<i>within</i>	Small mixed-use project - 6 senior condominium units	\$ 15,457,517		\$ 15,457,517
<i>within</i>	24 Hour Fitness Center (1st Ave. and Santa Clara)	\$ 7,860,000		\$ 7,860,000
—	Metro Gold Line grade separation		\$ 13,000,000	\$ 13,000,000
—	Downtown 2000 Project		\$ 9,000,000	\$ 9,000,000
<b>Subtotal</b>		<b>\$ 23,317,517</b>	<b>\$ 22,000,000</b>	<b>\$ 45,317,517</b>
<b>Claremont</b>				
<i>within</i>	Village Walk - Olson	\$ 27,842,328		\$ 27,842,328
<i>within</i>	North Village - Tolkin Group	\$ 11,528,236		\$ 11,528,236
<i>within</i>	Packing House Redevelopment - Artec partners	\$ 3,932,688		\$ 3,932,688
<i>within</i>	Public parking/retail structure		\$ 11,000,000	\$ 11,000,000
—	North Village improvements		\$ 3,000,000	\$ 3,000,000
—	Claremont General Plan Update		\$ 1,100,000	\$ 1,100,000
<i>within</i>	Traffic Management Center		\$ 500,000	\$ 500,000
—	Village Expansion Specific Plan		\$ 400,000	\$ 400,000
<i>within</i>	Sidewalk improvements (S. College adjacent to RR tracks)		\$ 65,000	\$ 65,000
<b>Subtotal</b>		<b>\$ 43,303,252</b>	<b>\$ 16,065,000</b>	<b>\$ 59,368,252</b>
<b>Duarte</b>				
—	Duarte General Plan Update		\$ 281,000	\$ 281,000
—	Town Center Concept Plan		\$ 40,000	\$ 40,000
<b>Subtotal</b>		<b>\$</b>	<b>\$ 321,000</b>	<b>\$ 321,000</b>
<b>Glendora</b>				
<i>within</i>	Mixed-use development - The Morgan Group	\$ 45,000,000		\$ 45,000,000
<i>within</i>	Mixed-use development - Gangi	\$ 8,600,000		\$ 8,600,000
<i>within</i>	Mixed-use development - Milan Properties,			
<i>within</i>	Residential development - Neiman Properties			
—	Route 66 Specific Plan		\$ 600,000	\$ 600,000
<b>Subtotal</b>		<b>\$ 53,600,000</b>	<b>\$ 600,000</b>	<b>\$ 54,200,000</b>
<b>La Verne</b>				
<i>within</i>	Lordsburg Courts development	\$ 15,000,000		\$ 15,000,000
<i>within</i>	University of La Verne Phase 1 Master Plan Development	\$ 10,000,000		\$ 10,000,000
<i>within</i>	Private Investment in San Palo and La Verne Business	\$ 9,500,000		\$ 9,500,000
—	Arrow Corridor Specific Plan	\$ 40,000	\$ 33,000	\$ 73,000
<i>within</i>	Paper Pack - Mixed-use Development		\$ 35,000,000	\$ 35,000,000
<b>Subtotal</b>		<b>\$ 34,540,000</b>	<b>\$ 35,033,000</b>	<b>\$ 69,573,000</b>
<b>Monrovia</b>				
<i>within</i>	Monrovia Station Square - Samuelson &	\$ 1,000,000,000		\$ 1,000,000,000
<i>within</i>	Monrovista development - Bowden	\$ 5,100,000		\$ 5,100,000
<i>within</i>	Mothers Foods development	\$ 1,000,000		\$ 1,000,000
<i>within</i>	Property acquisition for Monrovia Station Square - Samuelson & Fetter		\$ 21,000,000	\$ 21,000,000
<i>within</i>	Federal funding for station improvements		\$ 3,000,000	\$ 3,000,000
<i>within</i>	Foothill parking lot repaving		\$ 3,000,000	\$ 3,000,000
—	Monrovia General Plan Amendment		\$ 300,000	\$ 300,000
<i>within</i>	Mountain Avenue improvements		\$ 300,000	\$ 300,000
<b>Subtotal</b>		<b>\$ 1,006,100,000</b>	<b>\$ 27,600,000</b>	<b>\$ 1,033,700,000</b>
<b>Montclair</b>				
<i>within</i>	New Police Station		\$ 30,000,000	\$ 30,000,000
<i>within</i>	Infrastructure improvements		\$ 4,000,000	\$ 4,000,000
—	North Montclair Downtown Specific Plan		\$ 350,000	\$ 350,000
<b>Subtotal</b>		<b>\$</b>	<b>\$ 30,350,000</b>	<b>\$ 30,350,000</b>

## Metro Gold Line Foothill Extension Public and Private Investment

City	Project	Private Inv.	Public Inv.	Total
<b>Pomona</b>				
—	Pomona General Plan Update		\$ 1,200,000	\$ 1,200,000
<i>within</i>	Adoption of new redevelopment areas		\$ 200,000	\$ 200,000
	<b>Subtotal</b>	<b>\$</b>	<b>\$ 1,400,000</b>	<b>\$ 1,400,000</b>
<b>San Dimas</b>				
<i>within</i>	Mixed-use development - Fox	\$ 45,000,000		\$ 45,000,000
<i>within</i>	Mixed-use development land acquisition		\$ 1,500,000	\$ 1,500,000
—	San Dimas Downtown Charrette		\$ 30,000	\$ 30,000
	<b>Subtotal</b>	<b>\$ 45,000,000</b>	<b>\$ 136,369,000</b>	<b>\$ 181,369,000</b>
	<b>Total</b>	<b>\$ 1,845,860,796</b>	<b>\$ 272,738,000</b>	<b>\$ 2,118,598,796</b>

**LEGEND**

- not w/in* not within the 1/2 mile station radius
- not applicable



# City of Mission Viejo

Office of the City Manager

Trish Kelley  
Mayor  
Frank Ury  
Mayor Pro Tem  
John Paul "J.P." Ledesma  
Council Member  
Lance R. MacLean  
Council Member  
Gail Reavis  
Council Member

February 18, 2008

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

Dear Mr. Ikhata:

**RE: City of Mission Viejo Policy-Level Comments: SCAG Draft 2008 Regional Transportation Plan, Draft RTP Program Environmental Impact Report, and Draft RTP Growth Forecasts**

On behalf of the City of Mission Viejo City Council and the City of Mission Viejo Planning and Transportation Commission, I respectfully submit the following policy-level comments on the Southern California Association of Governments (SCAG) draft 2008 Regional Transportation Plan (RTP), draft 2008 RTP Program EIR, and draft RTP growth forecasts.

The SCAG RTP documents were discussed by the City of Mission Viejo City Council at its meeting of February 4, 2008, and by the City of Mission Viejo Planning and Transportation Commission at its meeting of January 28, 2008.

The City's comments focus on two key areas:

- 1) The RTP growth forecast that will be selected for the SCAG region; and,
- 2) Mitigation measures proposed in the draft RTP EIR.

The City of Mission Viejo's policy-level recommendations are as follows:

**City of Mission Viejo Policy Recommendation #1: SCAG's RTP Growth Forecast:**

***SCAG's adoption of a regional growth forecast for the 2008 RTP shall utilize, for Orange County, the Orange County Projections-2006 (OCP-2006) database, as adopted by the Orange County Council of Governments (OCCOG) on November 30, 2006.***

At a policy level, the City of Mission Viejo finds that:

- a) SCAG adoption of a regional growth forecast that incorporates OCP-2006 is consistent with adopted policy directive from the boards of directors of OCCOG and the Orange County Transportation Authority to use OCP-2006 as the basis for Orange County demographics in the 2008 RTP.
- b) OCP-2006 accurately represents both the distribution and amount of population, households and employment that are forecast individually for the City of Mission Viejo and for Orange County as



a whole, having been developed from a “bottoms-up” collaboration of Orange County jurisdictions and the Center for Demographic Research at CSUF.

- c) Through the “bottoms-up” collaboration and development of OCP-2006, OCP-2006 is the only database that has been approved by Orange County jurisdictions to accurately represent the latest available estimates and assumptions for population, land use and employment through Year 2035 in Orange County.
- d) The Center for Demographic Research at CSU Fullerton, which conducts the Orange County Projection Series, has identified a series of errors in the SCAG RTP Policy Growth Forecast that will require significant correction and amendment to appropriately represent Orange County’s future growth. Orange County’s future growth is accurately accounted for in OCP-2006 and is accurately accounted for in the SCAG RTP Baseline Growth Forecast.
- e) The OCP-2006 projections incorporate the review of Orange County landowners such as Rancho Mission Viejo, and appropriately represent the future growth of Rancho Mission Viejo’s landholdings.
- f) SCAG adoption of an alternate amount and distribution of growth for Orange County, contrary to OCP-2006, would fail to represent Orange County local and General land use plans, especially in relation to the 14,000 housing units and 16,000 jobs approved in the Ranch Plan Planned Community in South Orange County unincorporated area, which borders the City of Mission Viejo.

As an example, SCAG’s RTP Policy Growth Forecast significantly reduces the Ranch Plan Planned Community entitlement, by shifting almost 9,000 households (out of 14,000 residential units) and 11,000 jobs (out of 16,000 jobs) from the Ranch Plan entitlement. The SCAG Policy Growth Forecast further re-distributes these households and jobs to other Orange County locations where such intensification is contrary to local plans, such as in the cities of San Clemente, San Juan Capistrano and Irvine.

- g) Any growth forecast database adopted by SCAG as the regional growth forecast is required by State law to be used in county and local transportation models, in compliance with State Government Code 65089(c) which requires consistency in database between the regional SCAG transportation model, county models and local subarea models.

SCAG adoption of an alternate amount and distribution of growth for Orange County contrary to OCP-2006, and using such an alternate amount and distribution of growth in regional transportation analyses, could significantly distort the transportation needs and transportation capacity of planned Orange County regional improvements, such as the Foothill Transportation Corridor-South (SR-241) extension.

- h) At present, the only RTP growth forecast that fully incorporates the OCP-2006 projections is the SCAG RTP Baseline Growth Forecast.

Based upon the above, the City of Mission Viejo determines that OCP-2006 and its integration into the SCAG RTP Baseline Growth Forecast, represents the most likely growth projection for Orange County. OCP-2006 utilizes information based on local land use, current trends and long-term plans, and represents the most likely pattern and distribution of growth envisioned by local governments and major landowners in Orange County.

Thus, the City of Mission Viejo urges that SCAG adopt a 2008 RTP regional growth forecast that utilizes, for Orange County, the OCP-2006 database, as adopted by the Orange County Council of Governments (OCCOG) on November 30, 2006.

**City of Mission Viejo Policy Recommendation #2: 2008 RTP Draft EIR Mitigation Measures**

***SCAG shall remove those mitigation measures in the draft RTP EIR that would be applied to RTP transportation projects but which have no bearing on transportation project mitigation or transportation project delivery.***

***SCAG shall remove those mitigation measures in the draft RTP EIR that are proposed to be applied to local agency land use actions, such as General and Specific Plans and individual development projects, separate and distinct from transportation project delivery.***

At a policy level, the City of Mission Viejo finds that:

- a) The draft RTP EIR presents a framework of mitigation measures that implementing agencies and local Lead Agencies such as cities, would be responsible for ensuring adherence as specific RTP projects are considered for approval over time.
- b) The draft RTP EIR states that Lead Agencies such as cities are required to provide SCAG with documentation of compliance with EIR mitigation measures, through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process.
- c) Included in the listing of draft RTP EIR mitigation measures are measures relating to housing need, land use and re-zoning strategies to promote mixed use and compact growth, solid waste requirements and programs, school capacity analyses and recreation and open space planning, among others.
- d) Included in the listing of draft RTP EIR mitigation measures are measures that are duplicative of existing state law and mitigation measures that assign SCAG authority and responsibilities that are not in SCAG's purview.
- e) Included in the listing of draft RTP EIR mitigation measures are measures that recite draft Regional Comprehensive Plan policies. The draft Regional Comprehensive Plan has just been released for public review and comment, a separate environmental impact report is being prepared on the draft Regional Comprehensive Plan, and the Regional Comprehensive Plan policies have yet to be discussed and endorsed as regional policy by SCAG's Regional Council. Thus, the City of Mission Viejo believes it may be premature to include these policies as mitigation measures in the draft RTP. Further, while the Regional Comprehensive Plan has been proposed as an elective set of policies, several of these policies are identified as mandatory requirements in their counterpart mitigation measures.
- f) Included in the listing of draft RTP EIR mitigation measures are measures that impose requirements upon local government General and Specific Plans and individual development projects relating to open space considerations, separate from transportation project environmental assessment.

Based upon the above, the City of Mission Viejo expresses concern that certifying an EIR that includes mitigation measures as identified in (c) through (f) above, would complicate and delay transportation project environmental clearances, by requiring local agencies responsible for implementing 2008 RTP transportation projects, to respond to and comply with mitigation measures beyond the scope of

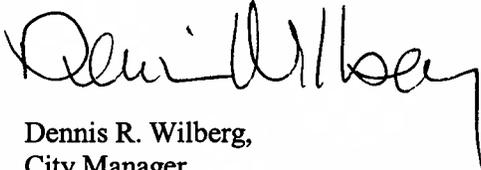
transportation project implementation and delivery. Such mitigation measures should therefore be removed from the 2008 RTP EIR. A listing of City of Mission Viejo recommendations on Draft 2008 RTP EIR mitigation measures is detailed in Exhibit 1.

In closing, the City of Mission Viejo supports the timely adoption of the 2008 RTP to enable critical transportation improvements to proceed forward in their future environmental clearances and project delivery. The policy-level recommendations identified above will ensure that Orange County's transportation needs match Orange County's planned growth. The policy-level recommendations identified above will also ensure that future environmental clearances for 2008 RTP transportation projects not be burdened with mitigation requirements that bear no relationship to transportation project implementation.

Further, the City of Mission Viejo understands that SCAG policy committees and the Regional Council will be briefed on key issues associated with the 2008 RTP at their regular meetings of March 6, 2008, in addition to a special meeting on March 19, 2008. The City of Mission Viejo City Council respectfully requests that you share these policy-level comments and recommendations with your policy committee and Regional Council representatives.

On behalf of the City of Mission Viejo, I also extend our appreciation for your personal outreach to better understand Orange County's comments and issues associated with the 2008 RTP, and with your meeting with the South Orange County mayors and city managers in January 2008 and with your meeting before the City of Mission Viejo City Council on February 4, 2008 to discuss the 2008 RTP.

With appreciation and on behalf of the City of Mission Viejo City Council and Planning and Transportation Commission,



Dennis R. Wilberg,  
City Manager  
City of Mission Viejo

**Exhibit 1: City of Mission Viejo Recommendations on Draft RTP Mitigation Measures**

- cc: City of Mission Viejo City Council  
City of Mission Viejo Planning and Transportation Commission  
Ms. Jessica Kirchner, SCAG  
Mr. Ryan Kuo, SCAG  
Ms. Jessica Meaney, SCAG  
Dr. Frank Wen, SCAG  
Mr. Darin Chidsey, SCAG  
Ms. Deborah Diep, Center for Demographic Research  
City of Mission Viejo City Attorney  
City of Mission Viejo Director of Community Development  
City of Mission Viejo Director of Public Works  
City of Mission Viejo City Engineer  
City of Mission Viejo Transportation Manager  
City of Mission Viejo Planning Manager  
Gail Shiimoto-Lohr, Consultant

**Exhibit 1:  
City of Mission Viejo Recommendations on Draft RTP EIR Mitigation Measures**

<b>SCAG Draft EIR Mitigation Measure</b>	<b>Issue of Concern</b>	<b>Recommendation</b>
<p><b>MM-LU.10:</b> Local governments should provide for new housing consistent with state housing law to accommodate their share of the forecasted regional growth.</p>	<p>Duplicate of state housing law and a local jurisdiction's mandated responsibility to address housing need through its General Plan housing element.</p>	<p>Delete MM-LU-10.</p>
<p><b>MM-LU.11:</b> 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.</p>	<p>Duplicate of state housing law and a local jurisdiction's mandated responsibility to address housing need and RHNA allocations, through its General Plan housing element and housing implementation plans.</p>	<p>Delete MM-LU-11.</p>
<p><b>MM-LU.14:</b> 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.</p>	<p>OCCOG, as a subregional organization, has no authority or jurisdiction to impose any land use requirements on the owner, developer or occupant of any property, or change, reduce or interfere with the local authority and decision-making of Orange County cities or the County of Orange [OCCOG Bylaws, Section 2.5: Limitation of Powers].</p> <p>Converting commercial, office and industrial properties to housing and mixed-use housing is a local government policy issue that is best addressed with a local government's General Plan process.</p>	<p>Delete MM-LU.14</p>
<p><b>MM-PS.17:</b> Project implementation agencies shall undertake project specific review of the public utilities and services as part of project specific environmental review. For any identified impacts, project implementation agencies shall ensure that the appropriate school district has the school capacity, or is planning for the capacity, that the project will generate. Appropriate mitigation measures, such as new school construction or expansion, shall be identified. The project implementation agencies or local jurisdiction shall be responsible for ensuring adherence to the mitigation measures. SCAG shall be provided with documentation of compliance with any necessary mitigation measures.</p>	<p>The issue of schools capacity and the need for a project to address schools capacity generation, has no bearing on transportation project implementation.</p> <p>This mitigation measure relates to new or redevelopment projects proposals and their impact upon schools capacity. For the City of Mission Viejo, schools capacity and coordination with local school districts is already addressed as a requirement in the City's General Plan Public Facilities Element and plan, to maintain appropriate levels of service for educational facilities in the City.</p>	<p>Delete MM-PS.17</p>

<b>SCAG Draft EIR Mitigation Measure</b>	<b>Issue of Concern</b>	<b>Recommendation</b>
<p><b>MM-OS.11:</b> Developers and local governments should submit for IGR review projects with potentially significant impacts to important farmlands. Projects should include mitigation measures to reduce impacts and demonstrate project alternatives that avoid or lessen impact to agricultural lands. Mitigation should occur at a 1:1 ratio.</p>	<p>This is almost identical to a proposed Regional Comprehensive Plan draft policy (Policy OSA-8, page 45) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.11</p>
<p><b>MM-OS.23:</b> 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.</p>	<p>This is a component of a proposed Regional Comprehensive Plan draft policy (Policy OSN-14, page 34) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.23</p>
<p><b>MM-OS.31:</b> Local governments should prepare a Needs Assessment to determine the level of adequate community open space level for their areas.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-7, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.31</p>
<p><b>MM-OS.32:</b> Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-8, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.32</p>
<p><b>MM-OS.33 and MM-POP-4:</b> SCAG's Compass Blueprint program and other on-going regional planning efforts will be used to build a consensus in the region to support changes in land use to accommodate future population growth while maintaining the quality of life in the region.</p>	<p>SCAG's Compass Blueprint program is an elective and voluntary set of principles to guide future development in the region. It is premature to include this policy as a mitigation measure in the 2008 RTP.</p>	<p>Delete MM-OS.33 and MM-POP-4.</p>
<p><b>MM-OS.34:</b> 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.</p>	<p>This is a component of a proposed Regional Comprehensive Plan draft policy (Policy OSN-14, page 34) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.34</p>
<p><b>MM-OS.35:</b> 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</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSA-5, page 45) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.35</p>

<i><b>SCAG Draft EIR Mitigation Measure</b></i>	<i><b>Issue of Concern</b></i>	<i><b>Recommendation</b></i>
<p>lands. Local governments should also consider the following:</p> <ul style="list-style-type: none"> <li>• Tools for the preservation of agricultural lands such as eliminating estates and ranchettes and clustering to retain productive agricultural land.</li> <li>• Easing restrictions on farmer's markets and encourage cooperative farming initiatives to increase the availability of locally grown food.</li> <li>• Considering partnering with school districts to develop farm-to-school programs.</li> </ul>		
<p><b>MM-OS.36:</b> Local governments should avoid the premature conversion of farmlands by promoting infill development and the continuation of agricultural uses until urban development is imminent; if development of agricultural lands is necessary, growth should be directed to those lands on which the continued viability of agricultural production has been compromised by surrounding urban development on the loss of local markets.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSA-7, page 45) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.36</p>
<p><b>MM-OS.39:</b> Local government should consider the most recent annual report on open space conservation in planning and evaluating projects and programs in areas with regionally significant open space resources.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSN-12, page 33) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.39</p>
<p><b>MM-OS.40:</b> Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-8, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.40</p>
<p><b>MM-OS.41:</b> Project sponsors and local governments should increase the accessibility to natural areas lands for outdoor recreation.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-9, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.41</p>
<p><b>MM-OS.42:</b> Project sponsors and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-10, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.42</p>
<p><b>MM-OS.43:</b> 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-11, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.43</p>

<b>SCAG Draft EIR Mitigation Measure</b>	<b>Issue of Concern</b>	<b>Recommendation</b>
<p><b>MM-OS.44:</b> Project sponsors and local governments should promote water-efficient land use and development.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-12, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.44</p>
<p><b>MM-OS.45:</b> Project sponsors and local governments should encourage multiple 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy OSC-13, page 39) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-OS.45</p>
<p><b>MM-PS.7:</b> 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....</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy EN-10, page 74 and Policy SW-14, page 103) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-PS.7</p>
<p><b>MM-PS.8:</b> 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy SW-10, page 102) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-PS.8</p>
<p><b>MM-PS.9:</b> Project implementation agencies shall discourage exporting locally generated waste outside 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy SW-11, page 103) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-PS.9</p>
<p><b>MM-PS.10:</b> Project implementation agencies shall adopt Zero Waste goals and practices and look for opportunities for voluntary actions to exceed the 50% waste diversion target.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy SW-11, page 103) that has yet to be adopted by SCAG's Regional Council. Further, this mitigation measure seems to already be under the purview of requirements and programs established by the State of California Integrated Waste Management Act of 1989 (AB 939), and the California Integrated Waste Management Board.</p>	<p>Delete MM-PS.10</p>

<b>SCAG Draft EIR Mitigation Measure</b>	<b>Issue of Concern</b>	<b>Recommendation</b>
<p><b>MM-PS.11:</b> Project implementation agencies shall build local markets for waste prevention, reduction and recycling practices.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy SW-13, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.11 is mandatory (shall).</p>	<p>Delete MM-PS.11</p>
<p><b>MM-PS.12:</b> 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy SW-15, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.12 is mandatory (shall).</p>	<p>Delete MM-PS.12</p>
<p><b>MM-PS.13:</b> Project implementation agencies shall develop environmentally friendly alternative waste management strategies such as composting, recycling, and conversion technologies.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy SW-16, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.13 is mandatory (shall).</p>	<p>Delete MM-PS.13</p>
<p><b>MM-PS.14:</b> Project implementation agencies shall develop and site composting, recycling and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy SW-17, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.14 is mandatory (shall).</p>	<p>Delete MM-PS.14</p>
<p><b>MM-PS.18:</b> The California Integrated Waste Management Board shall continue to enforce solid waste diversion mandates that are enacted by the Legislature.</p>	<p>MM-PS-18 seems to be an unnecessary mitigation measure that the 2008 RTP EIR is imposing upon a state agency which is already governed by state mandate (AB 939) to address solid waste diversion.</p>	<p>Delete MM-PS-18</p>
<p><b>MM-PS.19:</b> Local jurisdictions shall continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, shall encourage further recycling to exceed these rates.</p>	<p>Local government actions and programs to meet solid waste diversion rates are already governed by AB 939 and the California Integrated Waste Management Board. This mitigation measure appears to be duplicative of state law.</p>	<p>Delete MM-PS.19</p>

<b>SCAG Draft EIR Mitigation Measure</b>	<b>Issue of Concern</b>	<b>Recommendation</b>
<b>MM-PS.21:</b> Project implementation agencies shall coordinate regional approaches and strategic siting of waste management facilities.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-18, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.21 is mandatory (shall).	Delete MM-PS.21
<b>MM-PS.22:</b> 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.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-19, page 103) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.22 is mandatory (shall).	Delete MM-PS.22
<b>MM-PS.23:</b> 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.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-20, page 104) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.23 is mandatory (shall).	Delete MM-PS.23
<b>MM-PS.24:</b> 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.	This is a proposed Regional Comprehensive Plan draft policy (Policy SW-21, page 104) that has yet to be adopted by SCAG's Regional Council. Further, the Regional Comprehensive Plan version is an expectation (should), while Mitigation Measure MM-PS.24 is mandatory (shall).	Delete MM-PS.24
<b>MM-W.20:</b> Local governments should encourage Low Impact Development and natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-23, page 59) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.20
<b>MM-W.21:</b> 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.	This is a proposed Regional Comprehensive Plan draft policy (Policy WA-25, page 60) that has yet to be adopted by SCAG's Regional Council.	Delete MM-W.21

<b>SCAG Draft EIR Mitigation Measure</b>	<b>Issue of Concern</b>	<b>Recommendation</b>
<p><b>MM-W.22:</b> Local governments should integrate water resources planning with existing greening and revitalization initiatives, such as street greening, tree planting, development and restoration of public parks, and parking lot conversions, to maximize benefits and share costs.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy WA-26, page 60) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-W.22</p>
<p><b>MM-W.23:</b> 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy WA-27, page 60) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-W.23</p>
<p><b>MM-W.30:</b> 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy WA-9, page 58) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-W.30</p>
<p><b>MM-W.32:</b> Developers, local governments and water agencies should include conjunctive use as a water management strategy when feasible.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy WA-10, page 58) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-W.32</p>
<p><b>MM-W.35:</b> Developers and local governments should reduce exterior uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy WA-12, page 59) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-W.35</p>
<p><b>MM-EN.17:</b> 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.</p>	<p>This is a proposed Regional Comprehensive Plan draft policy (Policy EN-10S, page 76) that has yet to be adopted by SCAG's Regional Council.</p>	<p>Delete MM-EN.17</p>

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February 19, 2008

Southern California Association of Governments (SCAG) Regional Council  
Atten: Hasan Ikhrata, Executive Director  
Atten: Jessica Meaney, Assistant Regional Planner (meaney@scag.ca.gov)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017

**RE: Comments on the 2008 Regional Transportation Plan**

Honorable Regional Council Members:

The SoCal Chapter of the National Association of Industrial & Office Properties (NAIOP) is the largest commercial real estate organization in Southern California and one of the largest chapters in the United States, encompassing more than 1,200 members in Orange and Los Angeles Counties. The Chapter provides a unified voice to protect and enhance the commercial real estate industry and quality of life in Southern California. NAIOP SoCal is proactively involved in public policy and provides members with comprehensive educational programs and interactive business relationship opportunities. We appreciate the opportunity to provide our input on the 2008 Regional Transportation Plan.

Improving transportation and goods movement is NAIOP SoCal's highest priority because of the impact the issue has on NAIOP members and the overall economic vitality and quality of life in the region. As the representative of the Chapter's over 1,200 members and the 5.4 million workers who travel on the roadways to work in the office and industrial buildings in Los Angeles and Orange Counties, NAIOP has participated as a stakeholder in the discussions of the various alternatives. Based on our professional experience, NAIOP SoCal would like to provide the following comments:

1. The Regional Transportation Plan, and the Regional Comprehensive Plan, which looks at growth projections in the SCAG region, encourages the incorporation of "integrated land use and demand management", with the goal of developing growth policies that reduce driving. The RTP notes that "SCAG's Compass Blueprint Program, in addition to legislative efforts, shapes the implementation program for enacting these policies and programs...". NAIOP is concerned that the Compass Blueprint Program, implemented and encouraged as a voluntary effort, will actually become mandatory through legislation, currently most notable in SB 375(Lowenthal), which ties Federal transportation funding to city and county adoption of regional plans, such as the RCP. Since the RCP does not reflect the general plans of region counties, or cities within those counties, but on SCAG's concept on how these areas should be developed, the passage of legislation such as SB 375 will effectively mandate that jurisdictional areas deviate from their general plans.

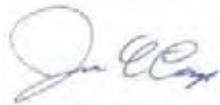
2. The RTP is using the OCP 2006 population projections in one of its concepts. However, SCAG is using another "optional" concept not using OCP projections. NAIOP is concerned that concepts not using OCP 2006 projections would severely impact Orange County transportation plans. We request that only OCP 2006 projections be utilized in the RTP.
3. NAIOP recommends that SCAG consider using a baseline alternative where no further new jurisdictions adopt the Compass Blueprint 2% plan, and one where substantially less than 100% of the future growth is accommodated under Compass Blueprint, but rather through traditional single and multi family developments. This approach provides an impact measurement that is more realistic, especially during the near term.
4. The non-governmental groups from which SCAG seeks participation and input (page 40 of the draft RTP) lists the "private sector" as one group at the bottom of the table. While other groups, such as "educational institutions" and "users of bicycle transportation facilities" are important, the builders of housing and commercial and industrial facilities represent a huge stakeholder that is conspicuous by their absence. Cooperation of developers, contractors and other employment groups involved in building are practitioners whose viewpoints and expertise are essential to the success of major components of the RTP, including land use management, construction of communities/facilities and the construction of transportation improvements. These stakeholders should play a larger role in providing input to this process.
5. The Integrated Land Use and Demand Management concept is the third set of strategies on the mobility pyramid, focusing on better management of demand on the transportation system through land use policies and encouragement of alternative modes of travel. This strategy relies heavily on the employment of the Compass Blueprint Growth Vision, wherein future development is encouraged along transportation corridors and usage of the automobile is dramatically reduced. NAIOP is concerned with two issues that are not adequately explored in the RTP. The first issue is that this concept assumes that alternative modes of travel, primarily rail and bus, will be adequate to service the increased clientele now living in Transit Oriented Developments (TOD) or working in facilities within the transportation corridor. The RTP actually emphasizes the congestion hurdles for rail and bus transit due to track and street demand. The second issue is that the Compass Blueprint concept does not adequately address the economic consequences of increasing the demand for smaller areas of land within the transportation corridors. In particular, if the Compass Blueprint is actually mandated by public policy, the effect will be to artificially create a land monopoly for properties surrounding major transportation centers. Developable land in areas in further outreaches could see their values drop dramatically. This economic dislocation would provide a windfall for some property owners and economic recession for others.
6. The Foothill South extension of SR 241 will have a profound effect on Southern Orange County mobility and goods movement. However, if this road is not built

the ramifications will also be profound. It is not clear that the RTP takes the elimination of this extension into adequate account, both in terms of direct impacts, but also on alternative transportation options that might be adopted (e.g. widening of the I-5, additional interchange improvements, etc.).

7. The RTP is substantially based on the growth projections provided within the Regional Comprehensive Plan and through population projections that make up that plan. There has been no serious challenge, or alternative scenario that envisions a stabilizing or reduction of growth rates in the Southern California counties due to "out-migration", prolonged economic stagnation, unacceptable cost of living and quality of life. There also does not appear to be any serious consideration to the conversion of fossil fuel vehicles to cleaner burning fuels during the 30-year time horizon. Both of these scenarios have some level of validity, especially the conversion of vehicles, simply based on known plans by automakers and legislative mandates from the Federal government. We feel that SCAG should at least address these issues somewhere in their RTP.
8. The RTP encourages the development of "complete communities", wherein can live, work, shop and play. The RTP also encourages planning for additional housing and jobs near transit. However, the plan discourages "dispersed" development in fringe areas. We feel that balanced communities in undeveloped parts of Southern California actually provide a better pressure relief valve than some plans to concentrate and make a development more dense on or near transportation centers. The key is for these developments to be able to provide jobs and housing that balance within the community, effectively reducing the need for residents to make daily commutes to outside job centers. This alternative also minimizes the "land monopoly" effect caused by mandating development within the so-called 2% solution.
9. The RTP is making progress in providing more support for dealing with the emerging goods movement crisis. NAIOP encourages SCAG to incorporate as much of the current Multi County Goods Movement Study to date and analysis as possible.

In conclusion, the NIAOP SoCal Chapter is available to participate and be a resource for the improvement of our regions transportation and goods movement.

Sincerely,



James V. Camp  
Legislative Action Committee Chair



Vickie Talley  
Director of Legislative Action

cc: NAIOP SoCal Board of Directors