

November 3, 2011

Attn: Honorable Pam O'Connor, President of SCAG and Regional Council members  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**RE: Active Transportation in SCAG's 2012 Regional Transportation Plan (RTP)**

Dear Honorable O'Connor, Regional Council members and Policy Committee members:

On behalf of the Southern California Safe Routes to School Network and the Los Angeles County Bicycle Coalition and the many other organizations and individuals who have signed this letter, we would like to thank SCAG staff, Regional Council and Policy Committee members for all their hard work to date, we recognize the multitude of efforts that go into developing a long range plan of this magnitude.

As SCAG prepares to release the draft 2012 RTP in December 2011, which is a 25 year plan allocating \$450 Billion in transportation funds throughout six counties in Southern California, and the region's first Sustainable Communities Strategy (SCS) as outlined under SB 375, we would like to share our rationale, observations and comments to the SCAG Board and policy committees on how the draft plan can better address public health and active transportation.

It is critical that the 2012 RTP set tangible and measurable goals to improve the safety of all community members, especially our most vulnerable road users, those walking and bicycling. We are concerned that the SCAG staff report to the Regional Council and Policy Committees, dated October 20th, failed to provide measurable goals in regards to Safety and Active Transportation. We encourage SCAG to be specific as to how the 2012 RTP/SCS will improve the safety of people walking and bicycling and how SCAG and the six County Transportation Commissions (SCAG Region CTC's: [Imperial County Transportation Commission](#) , [Los Angeles Metro](#), [Orange County Transportation Authority](#), [Ventura County Transportation Commission](#), [Riverside County Transportation Commission](#), [San Bernardino County Association of Governments](#)) can work to address and achieve policies listed such as: "making transit more bike friendly" and how to "encourage implementation of a Completes Streets policy across the region," ([as stated on page 11 of 10/20 staff report](#)).

Creating a more multi-modal transportation network in the SCAG region requires the RTP to be specific about how investments in active transportation will be funded, planned, prioritized, measured and developed in collaboration with partners and interested stakeholders. With those key principles in mind, we respectfully submit the following recommendations for your consideration:

**1. Fund: Increase Funding Levels for Bicycle and Pedestrian Infrastructure:** Currently close to 21 percent of all trips in the SCAG Region are done via walking and bicycling (2009 National Household Travel Survey) and 25 percent of all SCAG roadway injuries and fatalities are pedestrian and bicyclists (2008 SWITRS). The Region's last RTP, adopted in 2008,

allocated only 0.46 percent of its total funding for these modes. We respectfully request that the 2012 RTP includes strategies to significantly increase the proportion of funds allocated to active transportation so that over time, such funding reflects the proportion of trips made by walking and biking. We recommend the following:

- Preliminary estimates show a funding need in the range of \$22B to \$36B throughout the life of the 2012 RTP to fund the build-out of high priority pedestrian and bicycle investments as identified by local jurisdictions. Given the mode split, safety and collision trends, public health concerns and many other co-benefits we recommend that 5-8 percent of the 2012 RTP fund active transportation projects. (For a \$450B plan, 5 percent equals \$22B and 8 percent equals \$36B.)
- All future SCAG Regional Transportation funding strategies (i.e. congestion pricing, cordon pricing, VMT fees) should allocate 10 percent of all revenue towards walking and biking improvements and investments to help meet the unmet funding gap for active transportation.
- Recommend the formation of a Active Transportation Funding Committee to assist in next six months while the RTP continues its development and scheduled adoption in May 2012. We recognize going from 0.46% to 5%-8% is a significant jump in investments, however we maintain that there is a tremendous unfunded need to make our streets safer and usable for all users. Many from around the region would be interested in assisting with identifying strategies for the unmet active transportation funding needs, as we would be happy to play a leadership role in this Committee.

**2. Plan and Economics: Integrate Bicycle and Pedestrian Improvements into all Transportation System Preservation Projects:** Road maintenance and the first and last mile connections to transit are crucial for creating a connected and sustainable transportation system. System preservation is inherently important to people walking, biking, and connecting to transit; there needs to be enhancements for complete streets - ensuring that when maintenance opportunities arise or are scheduled, that the region is leveraging its limited resources to enhance our multi-modal transportation network. Currently the potential benefits to of the Transportation System Preservation category fail to address how these investments will improve the safety and access of people walking and biking - it only outlines benefits to drivers. Therefore we recommend:

- Embed a Complete Streets Policy within the Transportation System Preservation category that requires any investments into system preservation on surface streets include improvements for pedestrians and bicyclists, and those accessing transit.
  - Funding for Transportation System Preservation of highways needs to include bicycle and pedestrian safety improvements at on/off ramps to ensure greater safety of people using those modes on surface streets that connect with ramps and help knit communities, that have been adversely impacted by freeway on and off ramps, back together.
- Adopt a Complete Streets checklist that requires County Transportation Commissions to demonstrate how each project is addressing all modes. This checklist should be included in the 2012 RTP to be implemented in 2014. This will assist in prioritizing projects that are critical in achieving regional goals.

**3. Plan: Do Bicycle and Pedestrian Planning:** Improving the walking and biking environments in our region cannot be done without adequate planning at the local level. Unfortunately, many SCAG cities do not have bicycle or pedestrian master plans; in Los

Angeles County, for example, only approximately 11 of 88 cities have bicycle master plans and four cities have pedestrian plans. Additionally, current station area plans fail to take into account the first and last mile of transit trips, which are usually done on foot or by bicycle. This lack of planning is a significant impediment to improving infrastructure for people who rely on bicycling and walking to connect to transit, work, school, and their daily needs. As such we recommend:

- Expand the Compass Blueprint program to support SCAG cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans.
  - It is estimated that it would require approximately \$200,000 per city to develop these plans (95 cities at \$200,000). Identify and secure funding sources in order to set aside at least \$19M in the 2012 RTP to support these planning efforts.
  - Establish a goal of 50 percent of SCAG cities having completed at least one plan by 2016 in order to prepare for the 2016 RTP.

**4. Prioritize: Safety and Equity:** Bicyclists and pedestrians account for 25% of all roadway fatalities and injuries in the SCAG Region (2008 SWITRS), yet these modes are currently receiving less than 0.46% of all available funding (2008 SCAG RTP). Studies also show that a disproportionate amount of those injuries and fatalities occur in low-income communities (Traffic Injury Prevention 09/11). It is critical that we are doing all we can to ensure safety for all community members, regardless of where they live or how they travel. Earlier this month, the [Los Angeles Times wrote a compelling article](#) on 3 young girls walking to school who were severely injured when a car struck them, it is imperative that our transportation plans are doing all they can to make sure these tragedies, and the high number in which they occur in the SCAG region, end. For these reasons, we recommend that the RTP take the following steps to increase safety and equity:

- Analyze bicycle and pedestrian collision data to understand where high rates of collisions in the six-county region are happening and if collision rates are increasing or decreasing each year. SCAG staff should present a yearly report to the SCAG Board to help inform the public and Board on the state of walking and bicycling safety, and Safe Routes to School programs in the region. Many of the counties (San Bernardino, Riverside, Los Angeles) in the SCAG region are working to support local efforts and investments - these projects are increasing safety and improving the mode split, and addressing community concerns.
  - The RTP should set a goal of working towards zero deaths and should prioritize improving the safety of all transportation modes.
  - Utilize [Transportation Injury Mapping System \(TIMS\)](#) in the 2012 RTP. TIMS is a suite of Web-based tools created by researchers at the UC Berkeley Safe Transportation Research and Education Center (SafeTREC). The system is free and open to the public. Users can select collisions based on numerous criteria, as well as map each collision. The two most comprehensive TIMS tools are based on the California Statewide Integrated Traffic Records System (SWITRS) database of serious and fatal collisions. Currently, TIMS has SWITRS data from 2000-2008. Newer data will be added as it becomes available.
- Allocate greater resources to cities with little or no bicycle/pedestrian infrastructure and/or plans, high rates of collisions (using TIMS data), and significant populations of low-income residents. Identify these communities in the 2012 RTP in order to allocate resources for technical assistance and prioritize planning and infrastructure resources.
- Expand the “Toolbox Tuesdays” program to include bicycle safety design, pedestrian safety design, ADA design, and training on how to use the TIMS program for staff from

the 190 SCAG cities, to expand understanding of where collisions are happening, how to improve the safety for people walking and bicycling, and enhance local jurisdiction HSIP, SRTS, and other grant opportunity applications.

**5. Measure: Conduct Pedestrian & Bicycle Usage Counts:** We must increase documentation of bicycle and pedestrian usage and demand by regularly assessing numbers of people walking and biking. Without such figures, it is difficult to forecast usage or measure the positive benefits of investments in these modes.

- Create and fund a regional bicycle and pedestrian count program at SCAG establishing yearly usage counts at key locations in cities throughout the SCAG region. Use the data collected to establish trends, set goals, evaluate fund requests for facility improvements, prioritize improvements, and show the impacts of recent improvements. Set aside funds in SCAG's 2012/2013 OWP to create and maintain this program in future years. (See [link: Nashville Metropolitan Planning Organization's program, Technical Memorandum on Regional Pedestrian and Bicycle Count Procedures](#))
- The RTP should set a target for increasing the amount of all trips made by bicycle and the amount of walking to transit trips (measuring the 1st/last mile).

**6. Collaborate: Review Local Input, Provide Opportunities for Stakeholders to Engage and Incorporate Feedback:** There are growing voices all over the six county SCAG region in support of safe walkable and bikeable neighborhoods for users of all ages and abilities. Safe Routes to School programs and investments is an example of a broad-spectrum program that while focusing on improvements to ensure the safety of our youth, ultimately benefits the whole neighborhood. Many of these individuals, community members, professionals - and more, have concerns about the fundamental change needed in our region. SCAG conducted valuable and well run workshops this summer, and we commend those efforts, however we are concerned there has not been a report compiled and presented on the feedback received in those workshops. We understand SCAG staff is working on this. We urge these finding to be shared in a timely manner with the Board, so that they may understand their constituents. We ask that the staff to report on what was heard and how these comments are addressed in the draft 2012 RTP.

- We recognize there is a significant increased level of investments and policies outlined in this document, this is built on the demand, interest and support for active transportation happening all over the SCAG region. With increased opportunities for stakeholders to weigh in on the Region's Transportation plan, we believe this will strengthen the RTP and its ability to be successfully implemented over the coming years.

We recognize SCAG is not the implementer for transportation improvement projects, but SCAG does have the ability to do better planning, monitoring, collaboration, and evaluating to provide support and insight to counties, cities and communities on how to address our transportation opportunities and challenges and move towards safer and more usable streets for the region - regardless of choice of travel mode - all the while maximizing our limited resources in which to do so.

Thank you for considering our comments and concerns.

Sincerely,

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Sunyoung Yang  
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Tracy McMillan, Ph.D., MPH  
President, PPH Partners

Lars Clutterham  
Chair, Downey Chamber of Commerce Green Committee, and Chair, City of Downey Green Task Force

Individuals:

Nathalie Winiarski, City of Los Angeles  
Rye Baerg, City of Arcadia  
Arye Gross, City of Glendale  
Colin Bogart, City of Los Angeles  
Ryan Lehman, City of Los Angeles - Living Streets



**Richard I. Mueller**  
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February 9, 2012

Mr. Jacob Lieb  
SCAG  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017  
Via email: [2012PEIR@scag.ca.gov](mailto:2012PEIR@scag.ca.gov)

Subject: Official Comment on the 2012-2035 Regional Transportation Plan/EIR;  
Recommendation to Include an Underground, Automated Alternate to the  
East West Freight Corridor

Ladies and Gentlemen:

For the past two years I have been involved with the refinement and promotion of a freight transportation concept we call "Green Rail Intelligent Development", or GRID. GRID is composed of three major components, as follows.

- 1) A "SuperDock" to provide highly automated transfer of container freight directly between ships and trains. Two types of trains would be served by the "SuperDock", Class 1 trains for BNSF and Union Pacific to travel through the Alameda Corridor, and drone container trains to and from points in southern California.
- 2) A freight pipeline, essentially a tunnel for the drone trains to travel between warehouse districts in the Los Angeles region and the Ports.
- 3) Loading/unloading terminals to feed and receive drone trains into and from the freight pipeline/tunnel. These terminals would be strategically located near concentrations of warehouses in downtown Los Angeles, the City of Commerce, Rowland Heights, and Fontana.

The freight pipeline would essentially provide an unobtrusive, nearly noise-free, electrically powered alternative to the East West Corridor proposed in the RTP.

Initial indications are that the efficiency of the "SuperDock" and freight pipeline system could generate a sufficient cash flow for the system to pay for itself using current freight costs and without any tax increases. This system has received a specific endorsement from the Angeles Chapter of the Sierra Club.

I recognize there is insufficient time for the study of GRID that would be required for GRID to be included as an alternative in the current RTP. However, as soon as the draft RTP is finalized, I encourage SCAG to participate in an investigation of GRID to determine its viability. GRID provides an opportunity for a true paradigm shift in freight transportation within southern California that could significantly reduce highway congestion and make freight transportation to and through southern California competitive with that anywhere in the world.

Sincerely,

**Ameron International Corporation**  
**Water Transmission Group**

Richard I. Mueller, P.E.  
President



City of  
**Chino Hills**

February 2, 2012

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

Re: SCAG RTP 2012-2035

Dear Ms. Lin:

We have reviewed the draft Regional Transportation Plan (RTP) for the 2012–2035 planning period. The City of Chino Hills supports SCAG's efforts toward increasing mobility, sustainability and quality of life for all cities within the region.

Specifically, Chino Hills supports inclusion of the following improvements that are included in the RTP Project List:

- Improvement of Eucalyptus Drive from Peyton Drive to the Chino Hills Community Park entrance;
- Improvement of Peyton Drive from English Road to Eucalyptus Drive, consisting of the widening of Peyton from 4-6 lanes with marked bike lanes in each direction; and,
- Improvement of Peyton Drive from Eucalyptus Drive to SR 142, consisting of the widening of Peyton to 2-4 lanes with marked bike lanes in each direction.

As previously indicated in our October 11, 2011, resolution to SCAG, the City of Chino Hills is reserving its support of the proposed dedicated truck lane along the SR-60 freeway corridor until such time as substantial study has been completed and provided to potentially effected cities, including Chino Hills.

Please do not hesitate to contact me at (909) 364-2610 if you have any questions.

Sincerely,



Michael S. Fleager  
City Manager

MSF:JL:ssr

cc: Mayor and City Council Members



# SAN GORGONIO CHAPTER

4079 Mission Inn Avenue, Riverside, CA 92501 (951) 684-6203

*Regional Groups Serving Riverside and San Bernardino Counties: Big Bear, Los Serranos, Mojave, Moreno Valley, Mountains, Tahquitz, Santa Margarita*

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)

February 8, 2012

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). The San Gorgonio Chapter – Sierra Club is based in Riverside, California.

Our mission is: **To explore, enjoy, and protect the wild places of the earth; To practice and promote the responsible use of the earth's ecosystems and resources; To educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.**

Our organization represents approximately 5000 member/residents in San Bernardino and Riverside Counties. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR).

We are pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is an excellent first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.

Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas **that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of *critical habitat* to mitigate impacts related to future transportation projects" [emphasis added].** We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands."

**On page 78 of the Draft 2012 RTP/SCS**, the document mentions the 2008 Regional Comprehensive Plan that inventoried protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park and recreation areas. We were pleased that SCAG completed this Plan showing what areas are protected and critical to maintaining functioning habitat reserves. We agree that the planning efforts SCAG undertakes in the future should involve updating the maps, but recommend expanding the language in this section to include all forms of protected lands. By limiting the acquisition and management opportunities of conservation lands to just Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) areas, decisions about priority conservation areas will be misinformed. In fact, it no longer demonstrates a comprehensive plan because of the limited scope (of pre-established mitigation sites, which are likely unrelated to transportation projects). Protected areas (e.g., National Forests, State Parks, Regional Parks, etc.) not in an NCCP/HCP are excluded from the big picture, yet they have extensive benefits to the entire open space system and often times link important habitat areas throughout the region. Consequently, we recommend having this updated map and mitigation site locations expanded to include more than just NCCP/HCP areas and instead include all levels of protected lands (federal, state, regional, and local).

**On page 79 of the Draft 2012 RTP/SCS**, we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions. We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of **wildlife linkages in this section. Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.**

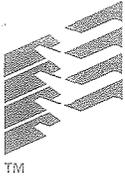
**We appreciate SCAG's effort to create a strategic planning process that would document important conservation lands in the region.** We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this policy. In addition, **we request to be included on any notifications (electronic or otherwise) about this policy's** creation and implementation, please send information to [kimffloyd@fastmail.fm](mailto:kimffloyd@fastmail.fm) .

Sincerely,

Kim F. Floyd  
Conservation Chair  
San Geronio Chapter – Sierra Club  
760-680-9479

Printed on Recycled Paper. ....To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness.



January 20, 2012

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

LAX

LA/Ontario

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Boyd Hight  
Ann M. Hollister  
Fernando M. Torres-Gil

Gina Marie Lindsey  
Executive Director

Re: Comments on the Draft 2012 Regional Transportation Plan

Dear Mr. Ikhata:

Los Angeles World Airports (LAWA) appreciates the opportunity to comment on the Draft 2012 Regional Transportation Plan (RTP), and is committed to working with all levels of government to address the future transportation needs of Southern California. As the operator of two of the region's commercial airports, Los Angeles International (LAX) and Ontario International (ONT), and operator of Van Nuys General Aviation Airport (VNY), LAWA plays an important role in meeting the region's demands for air travel and goods movement.

LAWA, as a proprietary department of the City of Los Angeles, is responsible for operating its airports in a safe, efficient, and fiscally responsible manner on behalf of our passengers and the citizens of each market service area. Furthermore, we must operate within the constraints placed upon our resources by federal law and regulation, along with our contractual obligations to our tenants and partner agencies. It is in this context that LAWA provides the following comments to the Aviation and Airport Ground Access portion of the RTP:

1. Use of Airport Funds

LAWA's first priority is to maintain safe and efficient airports. Our revenues and expenditures are used to support that effort and fulfill our commitment to supporting the national airspace system. All airports have a tremendous demand for capital improvements.

As such, most airports depend on financial support from the FAA via grant funds for eligible construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property. Using airport funds for non-airport functions violates federal law and jeopardizes the airport's ability to receive federal grants.



Nevertheless, LAWA seeks to partner with SCAG to find solutions to support ground access improvements to airports, other primary transportation facilities, and “secondary” airports in the region.

## 2. Use of Airport Express Buses

The RTP includes an “Action Step” which would plan and promote a regional system of airport express buses, modeled in part on the FlyAway<sup>®</sup> service currently operating at LAX. LAWA agrees that express buses are a promising solution to certain ground access problems. However, it has been LAWA’s experience that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service.

LAWA has spent a great deal of resources carefully studying the feasibility of establishing new FlyAway<sup>®</sup> routes to serve LAX. However, even for LAX, with its extensive market area and passenger base, it has been a challenge to find station locations that are both viable and successful. LAWA invites SCAG to continue examining ways to bring similar projects to other airports, but cautions that these services, by themselves, may not be effective in increasing passenger demand at “secondary” airports.

## 3. Aviation Activity Constraints

LAWA agrees that the aviation activity constraints in the region, and potential dispersion of that activity at other airports, should be re-examined in subsequent regional plans.

## 4. Additional Technical Clarifications

LAWA also wants to offer the following technical clarifications and comments to the RTP:

- SCAG has reported a number of vehicle trips to LAX under existing conditions as well as under a future forecast for 2035, citing the LAX Master Plan EIR/EIS as a justification for those trip numbers. However, the numbers reported do not correspond to data that LAWA has previously reported or used in any environmental analysis. LAWA requests clarification of those data points.
- LAWA recommends the following changes to Tables 4-6 and 4-7 in the Aviation and Airport Ground Access sections of the RTP:
  - In Table 4-6, the following projects should be included in the list of projects completed since the project notice of preparation in 2008 (footnote 1): Douglas St., La Cienega Blvd., Lincoln Blvd. (all), Nash St.,

Sepulveda Blvd. (both), the I-105 westbound off-ramp at Sepulveda Blvd., and the I-405 at SR-90.

- Two other projects on Table 4-6, Arbor Vitae St., and the I-405 from I-10 to SR-101, are under construction as of January 2012.
- In Table 4-7, Project LAX-19, which includes Lincoln Blvd. improvements, has already been completed.
- LAWA recommends that SCAG include in the RTP a portion of the project referred to as LAX-10, widening Aviation Blvd. from Century Blvd. to Manhattan Beach Blvd. to 3 lanes in each direction.

#### 5. 2011 Air Passenger Survey

Lastly, the 2006 LAX Air Passenger Survey was used to create several data points within this section of the RTP. LAWA is hoping to unveil the results of its 2011 Air Passenger Survey in February of this year. SCAG should consider updating its Appendix with this new data as it finalizes the RTP. LAWA will post the results of this survey on our website (<http://www.lawa.org>) once the report is completed.

Thank you for the opportunity to review the 2012 Draft RTP. We hope that these comments will be helpful in developing a successful plan for the region. If you have any questions regarding these comments, please contact Diego Alvarez, Regional Transportation Coordinator, at 424-646-5179 or [dalvarez@lawa.org](mailto:dalvarez@lawa.org).

Sincerely,



Michael D. Feldman  
Deputy Executive Director

MDF:DA:yl



February 9, 2012

Mr. Jacob Lieb  
Ms. Margaret Lin  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

***Re: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR)***

*Sent: Via e-mail ([rtp@scag.ca.gov](mailto:rtp@scag.ca.gov) and [2012PEIR@scag.ca.gov](mailto:2012PEIR@scag.ca.gov)) and via 1<sup>st</sup> Class Mail*

Dear Mr. Lieb and Ms. Lin:

On behalf of the Arroyo Verdugo Subregion, please accept these comments regarding the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated Transportation Conformity Report and Draft Program Environmental Impact Report (PEIR), which were approved at the Arroyo Verdugo Steering Committee Meeting of February 6, 2012. It is important to state, out of respect for all of my colleagues on the Steering Committee, that the cities of Burbank and Pasadena abstained from all of these comments. However, the majority of the cities (Glendale, La Cañada Flintridge and South Pasadena) did approve these comments to be forwarded to you for review.

Our comments are as follows:

- 1. PURSUANT TO FEDERAL REGULATIONS, PROJECTS SHOULD NOT BE INCLUDED IN THE RTP/SCS CONSTRAINED PLAN, WHICH HAVE ONLY SECURED A SMALL PORTION OF THE REQUIRED FUNDING NEEDED TO COMPLETE THE PROJECT:**

The RTP/SCS, according to federal regulations, in “nonattainment and maintenance areas,” (which includes the area covered by the RTP/RCS) must “address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance” (23 CFR § 450.322 (b) (11) (part)). Projects which only have secured a small portion of the needed funding, and which rely on speculative funding, such as potential and/or possible tolling authority, should not be included in the RTP/SCS, since this inclusion does not meet the federal requirements for a fiscally constrained plan.

**2. LANGUAGE SHOULD BE INCLUDED IN THE RTP/SCS REQUIRING A FULL COST/BENEFIT ANALYSIS FOR ALL PROJECTS IN THE CONSTRAINED PLAN:**

Language should be included in the RTP/SCS that clearly states that a full cost/benefit analysis shall be completed for each project contained in the RTP/SCS constrained plan.

**3. SCAG SHOULD VIGOROUSLY PURSUE PROJECTS WHICH WOULD PROVIDE ENVIRONMENTALLY SUPERIOR ALTERNATIVES TO THOSE CURRENTLY IN THE PLAN IN ORDER TO BEST COMPLY WITH EXISTING ENVIRONMENTAL LEGISLATION:**

The PEIR states that: (1) "*Re-entrained roadway dust would increase proportionate to VMT. This would be a significant impact;*" (2) "*Impacts related to total GHG (Greenhouse Gas) emissions were determined to be significant even after mitigation.;*" (3) the PM10 Emissions Exhaust Only for Heavy Duty Trucks will increase (Table 3.2-4).; and (4) the "*Plan would result in a significant and unavoidable impact related to heavy-duty truck VHD [Vehicle Hours Driven], among other impacts.*"

SCAG should vigorously pursue projects under CEQA, the Clean Air Act, SB375 and AB 32 which would provide environmentally superior alternatives to those currently in the Plan, such as freight to rail mixed with additional transit. Additionally, sensitive receptors, such as schools and residences, must have adequate mitigation measures that satisfy these legal requirements.

**4. MAJOR HIGHWAY EXPANSION PROJECTS SHOULD NOT BE FRONTLOADED IN THE RTP/SCS:**

The RTP/SCS frontloads highway modalities by disproportionately allocating funding and anticipated completion dates. This is evidenced by comparing Table 2.2 - *Major Highway Completion Project* against Table 2.5, *Major Transit Projects*, in chapter 2 of the RTP/SCS. Transit projects are built in segments with the final project not being completed until 2030-2035. Expanding highways induces VMT and therefore frontloading major highway completion before transit projects does not comply with the tenets of SB 375 and AB 32 to reduce greenhouse gas emissions by reducing VMT. Additionally it is well documented that land uses adjacent to freeways are prone to increased toxins which cause negative health impacts.

According to SCAG staff, highway projects may be more easily financed than transit projects by borrowing against future toll revenues. They state that this is the reason the highway projects are frontloaded. This financial reasoning does not justify sacrificing environmental concerns by building the highway projects prior to transit projects.

**5. THE TERM "SR-710 GAP CLOSURE" USED IN THE PLAN SHOULD BE SUBSTITUTED WITH "710 NORTH EXTENSION":**

The "SR 710 Gap Closure" language, already in the 2008 RTP, should be modified to consistency with Metro's stated intent, which should serve to ease, if not eliminate, the current polarizing language. The shift in title from "710 North Extension" to "710 Gap

Closure” is invalid, since there is no gap. SR-710 terminates at Valley Boulevard. There is no northerly extension to connect to, since the portion of the 210 interchange including Del Mar Boulevard was built conditioned upon the fact that it “would have no effect on the decision as to the ultimate freeway location and will not foreclose alternatives to the proposed ultimate ...Freeway.” This title seems to create a sense of inevitability or priority for this project over competing ones and cannot be justified.

**6. SCAG ASSUMPTIONS REGARDING THE “SR-710 GAP CLOSURE” PROJECT PRODUCING CONGESTION RELIEF AND LOWER GREENHOUSE GAS EMISSIONS ARE FLAWED, BASED UPON EMPIRICAL RESEARCH ON OTHER HIGHWAY PROJECTS THAT HAVE BEEN BUILT:**

The PEIR states that “The Plan would increase VMT when compared to existing conditions.” (SCAG RTP/SCS p. 3.2-25). Specifically, decreasing VMT is the goal of SB 375 and should also be the goal of the RTP/SCS. The increase in VMT is the Plan’s reliance on freeway (whether tunnel freeway or above ground freeway) expansion to meet the region’s mobility needs. Notably, the RTP/SCS describes the SR-710 tunnel as a tunnel with 4 lanes in each direction. This is a major highway expansion being introduced into the region. To the extent that this causes the widening of other freeways (such as the I-210), it will further expand the freeway system. The region would be better served with an alternate project which is not highway oriented and which would potentially decrease VMT, rather than increasing it.

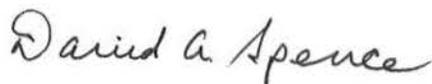
SCAG assumes that the SR-710 extension will produce congestion relief and lower greenhouse gas emissions. These assumptions are not borne out by recent research, and there are a host of other previous studies showing that an increase in highway capacity increases VMT and that once the project is built, congestion, within a few years, returns. These SCAG assumptions are flawed.

**7. THE DEFINITION OF THE SR-710 GAP CLOSURE PROJECT FROM ONE PRECISE POINT TO ANOTHER THREATENS PROGRAM-LEVEL CONFORMITY IN THE PLAN AND PREJUDICES FUTURE ENVIRONMENTAL ANALYSES:**

The Plan has modeled the SR-710 extension from one precise point north to another. Unfortunately, this assumption removes the low-build or multi-modal solution to the congestion problem. Under federal regulations, because of this specificity, the Plan and the PEIR threaten program-level conformity and prejudice future project-level environmental analyses.

Thank you for your careful consideration of our comments.

Sincerely,



David A. Spence  
Chair of the Arroyo Verdugo Steering Committee

c: Members of the Arroyo Verdugo Steering Committee



February 9, 2012

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

**Subject: 2012 RTP**

Dear Mr. Ikhata:

For more than a century the Automobile Club of Southern California, with six million members, has advocated for better mobility, traffic safety, quality of life, and economic opportunity. We support policies and projects to achieve these objectives and reasonable and fair ways to pay for them.

Development and approval of an effective and achievable Regional Transportation Plan (RTP) is crucial to a more mobile and stronger economic future. The Auto Club commends the Southern California Association of Governments (SCAG) for its work on the draft RTP, for highlighting and addressing important issues, and for including needed strategies ranging from expanded road, transit, and goods movement capacity to system preservation. The following are comments and recommendations to strengthen the RTP and ensure its implementation delivers promised benefits.

**Government, business, and user stakeholders need to work together to implement realistic and appropriate new revenues.** The RTP assumes \$220 billion in new taxes and fees (mostly levied on motorists) and financing over the next 20+ years. Some of these assumptions are not realistic and will not likely happen. And other funding options, not now in the plan, might be implemented. The region needs to work together to identify and advance the best, most appropriate funding options to provide needed financing for RTP priorities.

**The RTP must protect and uphold the transportation priorities approved by voters through various local transportation sales tax measures.** Voters in five counties approved sales tax measures to fund specific highway and transit projects. The RTP must include and support all of these priorities and help deliver what voters were promised and what voters approved. Failure to do so will make approval of future funding measures nearly impossible.

**The 15¢ gas tax increase assumed through 2024 is reasonable if it is paired with state and national reforms to ensure funds will be spent efficiently on effective projects.** Gas tax rates

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Auto Club Enterprises provides service to more than 13 million members



have not changed in almost 20 years. This user tax has been the backbone of transportation funding for decades and it will continue to be an important resource for years to come.

**The final draft RTP clearly rules out a previously considered regional gas tax or gas “fee.” This is an important improvement that should be maintained in the final plan.** Gas taxes have been implemented at the state and national level for decades. Attempting to extend such authority to local or regional government is not realistic and will hamper other efforts to fund transportation. Re-labeling the gas tax as a “fee” does not change the fact that it is a tax protected by the State Constitution and numerous voter-approved measures. For these reasons the Auto Club strongly opposes any attempt to impose local gas taxes or any form of a “fee” on gasoline.

**The Vehicle Miles Traveled (VMT) charge included in the RTP should be studied further as a long-term replacement for the gas tax. However, the amount of the proposed VMT is significant, it will not be accepted by many people, and it needs to include assurances regarding how the funds will be spent.** The proposed VMT fee is projected to generate \$110 billion (half of the RTP’s funding shortfall). To generate this amount, the proposed VMT charge is equivalent to a tripling of the gas tax in addition to new tolls and other user fees. Such a large tax increase places a significant burden on motorists without assurances of an equivalent or proportionate benefit.

**Tolls can be an important financing tool for new general purpose highway lanes and for allowing more vehicles to use existing HOV lanes by making them HOT lanes. Tolls should not be imposed on existing general purpose lanes.** The user-pay, user-benefit principle is an important cornerstone of transportation funding. Charging tolls for new lanes or to allow more vehicles to access HOT lanes provides both needed funding for the new facilities and inherent value to users paying the toll. However, there is no assurance that motorists will adequately benefit from tolls or congestion fees imposed on existing freeway lanes or surface streets. New taxes and fees are only successful when the public understands and sees a clear benefit for paying them.

**The RTP needs to recognize that the most realistic and effective way to achieve desired emissions reductions has been and will continue to be through technology advancements and not through sweeping attempts to fundamentally alter lifestyles and economic, geographic, and demographic patterns.** Although SB 375 and its Sustainable Community Strategy are required elements of the RTP, they are not likely to significantly reduce GHG emissions. Improving and encouraging transit, bicycling, and walking are appropriate and good objectives for the RTP. However, emissions reductions from these efforts will be very small compared to those that can and will be achieved through other means. These other means include improving automobile technologies, alternative fuel and energy sources, and better system preservation and management to improve traffic flow and safety.

Thank you for this opportunity to share our thoughts on the draft RTP. The Auto Club looks forward to continuing our work with SCAG and other transportation and business partners to productively, realistically, and meaningfully address Southern California’s mobility and financial challenges. Please feel free to contact me at 714-885-2307 or [finnegan.steve@aaa-calif.com](mailto:finnegan.steve@aaa-calif.com).

Sincerely,



Stephen Finnegan  
Manager, Government Affairs and Public Policy

c: SCAG Regional Council

February 10, 2012



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

California Trucking Association Comments  
Southern California Association of Governments (SCAG)  
2012 Regional Transportation Plan

To Whom It May Concern:

On behalf of the members of the California Trucking Association, we thank you for allowing us to submit our comments on the 2012 SCAG Regional Transportation Plan.

The California Trucking Association (CTA) is a non-profit trade organization representing over 4,000 individual trucking companies and suppliers. Members of our association range from single truck owner-operators to large Fortune 500 companies, and we are the largest state trucking organization in the country.

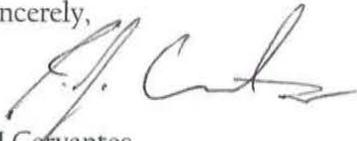
The bulk of our membership is either headquartered in the SCAG area of influence, or has terminal operations in the region in order to move their goods throughout Southern California. Our membership is heavily invested in how the transportation system in Southern California is planned, funded, operated, and maintained. We seek to be partners with SCAG in planning for the region's infrastructure future so that goods can continue to move efficiently and economic growth continues to take place.

As your Goods Movement Appendix indicates, goods movement dependent industries employ almost 3 million people in the region, and contribute over \$250 billion to the region's GDP on an annual basis (Goods Movement Appendix, Page 10). Trucks are the very backbone of the economic power of these industries. However, our Association is well aware that in order for Southern California to keep this economic strength and to stay competitive in the global marketplace, policy makers and industry groups will have to work together in order to secure stable and robust funding sources for all segments of the region's transportation system.

We also seek to be a partner with SCAG in promoting policies that balance economic growth with clean air and environmental sustainability concerns. Over the past decade, our members have invested billions of dollars in new technologies and equipment that will ensure that the citizens of the SCAG region will breathe cleaner air well into the future.

Below are our comments on the 2012 Regional Transportation Plan. We hope that these comments will help SCAG promote an environment where trucking companies can continue to operate and thrive in Southern California. If you should have any questions or concerns in regards to our comments, or if there are resources we can provide for you, please do not hesitate to contact us.

Sincerely,



RJ Cervantes  
Transportation Policy Coordinator  
(916) 373-3563  
[rj cervantes@caltrux.org](mailto:rj cervantes@caltrux.org)

California Trucking Association (CTA) Comments  
Southern California Association of Governments (SCAG)  
2012 Regional Transportation Plan

Transportation Finance:

The California Trucking Association is concerned about some of the assumptions made for the “Reasonably Available Revenues” projections. SCAG has identified \$219.5 billion in additional revenues that according to the RTP are “...likely to materialize within the RTP time frame” (SCAG 2012 RTP, Page 7).

- A substantial portion of the \$219.5 billion that has been identified is the \$110.3 billion that would be generated from a “Mileage-Based User Fee” set at \$0.05 per mile and commencing in 2025 (2012 SCAG RTP *Transportation Finance Appendix*, Pages 15, 16). Although SCAG notes that they’ve projected the fee to commence in 2025, substantial amount of study is needed on the feasibility of implementing such a system on commercial motor carriers. To date, there has been little to no study done on how a system would be administrated, or what the financial burden would be for motor carriers and ultimately consumers.
- Although SCAG has also indicated that the revenues projected from a mileage based user fee will be generated on a national level, the California Trucking Association will note that it strongly opposes the implementation of a mileage based user fee on local or regional levels (2012 CTA Federal Transportation Policy Guideline).
- SCAG has also \$4.2 billion in projected revenue generation from a “Free Fee/National Freight Program” (2012 SCAG RTP *Transportation Finance Appendix*, Page 7). The California Trucking Association has supported the inclusion of the National Freight Program in the Senate Environment & Public Works Committee Map-21 legislation. However, we have not endorsed specific strategies to fund any expenditures made through the program other than the existing Highway Trust Fund sources (2012 CTA Federal Transportation Policy Guideline).
- The California Trucking Association also strongly opposes local, regional or statewide freight fee proposals that would compromise the competitiveness of California’s shipping, warehousing and commercial trucking industry. Such a system must be explored, developed, and implemented on a national level only.
- SCAG has also projected \$22.3 billion in revenue generation for the region through the tolling facilities associated with the I-710 Freight Corridor, the East-West Freight Corridor, the High Desert Corridor, and the SR-710 tunnel (2012 SCAG RTP *Transportation Finance Appendix*, Pages 34, 35). In general, the California Trucking Association opposes tolling as a means for revenue generation due to the high overhead costs associated with running tolling facilities and programs, the potential for increased congestion around tolling facilities, and the disproportionate financial burden that is placed on the trucking industry.

- In addition, the California Trucking Association is very concerned about the toll revenue estimates that have been associated with the East-West Freight Corridor and the I-710 Freight Corridor. If these projects are planned as zero-emission corridors as a part of the Goods Movement Environmental Strategy and Action Plan as outlined by the RTP, the near term revenues generated from these tolling facilities will not meet the estimated projections that have been provided due to an overestimate of zero emission technology penetration rates.

### Project List:

In general, The California Trucking Association's analysis of the Project List Appendix has been positive. We are encouraged that SCAG continues to be concerned about the degradation of our roadway system, and is planning to invest significant amounts of capital in maintaining our current roadway infrastructure. We firmly believe that such efforts will improve goods movement efficiency, reduce congestion, improve regional economic productivity, and reduce pollution. However, we do wish to address our concerns with a few projects listed in the Financially Constrained RTP List:

- SCAG includes \$3,771,002,000 for 'goods movement research and development' as a part of the resource constrained plan in measure RRC0703 (2012 SCAG RTP *Project List Appendix*, Page 422). We believe that this allocation is not mentioned in the Goods Movement appendix or in the RTP. To avoid confusion or conflict, SCAG needs to clearly identify where these funds would come from, and specifically, what they would be used for. What technologies and sectors would 'goods movement research and development' cover? Where could we find the description of RRC0703?
- Also, identified in the list is a \$5 billion allocation for a "Goods Movement Bottleneck Relief Strategy" (2012 SCAG RTP *Project List Appendix*, Page 422). The California Trucking Association is supportive of indentifying and improving bottleneck choke points that restrict the ability to move goods efficiently by trucks. Moving forward, we urge SCAG to include industry stakeholders in any discussions so that input can be given on the locations which are restrictive to motor carriers.
- The California Trucking Association has not taken a position on whether or not to endorse the East-West Freight Corridor (2012 SCAG RTP *Project List Appendix*, Page 422). We hope to continue having discussions with SCAG in regards to the project's costs, access abilities, and design concepts. However, we urge SCAG to immediately inform any and all property owners along the project alternative alignments about the potential for future eminent domain issues. SCAG should account for funds that will be needed to fairly compensate property owners that could potentially be affected.

## Goods Movement:

The members of the California Trucking Association are dedicated to working with policy makers in order to enhance the quality of life of all Californians through environmental protection measures that are based on sound science and that are balanced with the realities of the economic market place. In the past decade, the trucking industry has gone through transformative changes due to regulatory mandates and voluntary competitive measures in order to get cleaner trucks on the road. SCAG's Goods Movement Environmental Strategy and Action Plan are of great interest and concern to our members that have made substantial investments in new technologies at dramatic costs to their companies. Below are our specific concerns related to this program:

- SCAG should acknowledge that participation of goods movement stakeholders in any of the strategies identified by SCAG in the Goods Movement appendix would be a voluntary process and not mandatory. Mandating specific technologies undermines the investments our members have made in response to the Air Resources Board's (ARB) Truck & Bus Rule. The California Trucking Association would strongly oppose any and all efforts to impose a new timeline for truck turnover that would differentiate from the ARB regulations.
- SCAG provides a specific timeframe for the study and demonstration of various zero or near-zero emission technologies. (2012 SCAG RTP *Goods Movement Appendix*, Page 34). The information is presented in a way that might be applicable for all of the technology options and all fleets. In fact, there is significant variation in the different technologies' stages of development. Not all technologies have been created equal due to implementation concerns and market readiness. SCAG should account for this reality.
- In order to introduce zero or near-zero emission technologies in private fleets, SCAG would need to work with regional company owners by providing significant amounts of capital to meet the goals laid out in the plan. The upfront incremental costs for these vehicles vary from \$20,000 - \$100,000+ over comparable diesel powertrains. These figures do not encompass the significant infrastructure investments and loss of operational flexibility associated with zero and near-zero emission technologies. Which activities have funds currently available and have been accounted for in the RTP's fiscally constrained plan? SCAG needs to help identify where the funding will come from in order to meet these new goals.
- If there is funding currently available, SCAG needs to state that they plan to carry out the timeline presented for the implementation of a zero and near-zero emission freight system. If not, it should be pointed out that such a project could not be implemented until or unless funding becomes available.
- Additionally, SCAG should note that any full scale demonstration and/or commercial deployment would need the full support of the involved stakeholders to move forward. SCAG should also include a provision that the business stakeholders will be involved in the design of the parameters for a full-scale demonstration.

- Furthermore, the final stages in the timeline are unrealistic and should be lengthened to give adequate time for zero-emissions technologies to mature and undergo sufficient testing. An inadequate or insufficient demonstration program could result in premature adoption and could lead to serious disruptions to the goods movement system and thus unintended consequences from significant job loss and economic impacts to the region.
- As trucking companies work together with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the vehicle.
- SCAG should clearly state in the RTP that to date, stakeholders have not reached consensus on technologies, timing, funding, or emissions impacts of possible the various options SCAG examined in the Goods Movement Environmental Strategy and Action Plan.
- It would be unwise to commit funding to large scale infrastructure projects to support zero emission transportation technologies until these technologies mature. Certain early approaches may quickly become obsolete as heavy duty partial hybrid electric and battery electric vehicles reach commercialization.
- SCAG should not oversell its timeline for zero emission technology implementation. SCAG does not have control over technology penetration rates nor can it predict how this market, just barely in its infancy, will perform in the coming years. Arbitrary timelines are not a substitute for the kind of analysis that produces good public policy and efficient government expenditure.

#### I-710/East-West Freight Corridors

- We agree with SCAG's observation that the zero and near-zero emission heavy duty vehicle market has yet to develop a fully market ready technology as of the authoring of the 2012 RTP.
- SCAG should approach the role of the Freight Corridors in nurturing this emerging market realistically. While exemption from tolls or other privileges granted zero and near-zero emission heavy duty vehicles will play a role in incentivizing accelerated adoption, these technologies will face significant implementation challenges out of SCAG's control.
- Facility restrictions that prevent National Network terminal access for reasons other than safety are currently prohibited by federal law.



## Citizens Alliance for Property Rights

January 30, 2012

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*Susan Kline*  
President

Pam O'Connor, President  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

*Alice Eaton*  
Vice President

Dear Ms. O'Connor:

*Debra Tash*  
Treasurer  
Secretary

RE: RTP and SCAG Land Use Planning – An Open Letter

*Michael Greer*  
Director

Please note that many of our members recently attended what was one of many so called, "Visioning" sessions. This one was geared to our local elected officials and held at the Camarillo Public Library on January 19, 2012. Please note that very little public notice was given for the session. We were only made aware of it through a third party. At the beginning of this session we were subjected to a film clip that was little more than "touchy feely" propaganda. Adorable young tykes extolled the virtues of "walkable" communities and public transportation. The presentation was halted half way through due to questions from citizens who took umbrage to a plan that is, in truth, a one size fits all blueprint. These citizens are well aware that, "sustainable community strategies" is a marketing term crafted to pull the proverbial wool over the public's eyes. That it is, in fact, a move toward regional governance which will further distance voters from those who they have entrusted to safeguard their interests. Further we do believe 84 elected officials, from various cities and counties, can do what is in the best interest of their citizens when crafting policies for the over 18,000,000 residents residing within SCAG's boundaries.

*Stuart Kline*  
Director

*David Stewart*  
Director

We understand that more of these sessions are planned but that Ventura County has already had its allotted two in January. Yet, really, how much of the public were made aware of what you are planning? How many know that SCAG, once tasked to plan for future growth, has now morphed into a regional government that will alter our lifestyles and erode our freedom. How many of the taxpaying citizens of our county would agree to having so much of their transportation dollars funneled into transit and away from road expansion? How many would agree to plans for denser, pack and stack, development in what are suburban communities?

*Bob Baker*  
Director

Citizens Alliance for Property Rights (CAPR), Ventura County, wishes to go on record opposing the implementation of your proposed sustainable strategies. Your plans have already damaged our communities, hampered our valuable agricultural industry, and caused further waste of precious taxpayer funds. Denser development makes sense for Santa Monica, the area you represent, Ms. O'Connor. However it makes no sense whatsoever in communities like Thousand Oaks and Simi Valley where people have moved to raise their families and enjoy a suburban lifestyle.

In closing, be aware we are watching you, know what a sham the Compass Blueprint is and how your efforts are shackling the very people you have, as elected officials, been sworn to serve.

Sincerely,  
The Board of Directors  
Citizens Alliance for Property Rights, Ventura County

cc: Linda Parks Ventura County Supervisor, Bryan A. MacDonald Oxnard City Council, Glen Becerra Simi Valley City Council, Carl Morehouse San Buenaventura City Council, Keith Millhouse, Moorpark City Council



**CITY COUNCIL**

David A. Spence, Mayor  
Stephen A. Del Guercio, Mayor Pro Tem  
Michael T. Davitt  
Laura Olhasso  
Donald R. Voss

February 9, 2012

Mr. Jacob Lieb  
Ms. Margaret Lin  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

***Re: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR)***

*Sent: Via e-mail ([rtp@scag.ca.gov](mailto:rtp@scag.ca.gov) and [2012PEIR@scag.ca.gov](mailto:2012PEIR@scag.ca.gov)) and via 1<sup>st</sup> Class Mail*

Dear Mr. Lieb and Ms. Lin:

On behalf of the City Council of the City of La Cañada Flintridge, please accept these comments regarding the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated Transportation Conformity Report and Draft Program Environmental Impact Report (PEIR).

The City's comments are as follows:

- 1. PURSUANT TO FEDERAL REGULATIONS, PROJECTS SHOULD NOT BE INCLUDED IN THE RTP/SCS CONSTRAINED PLAN WHICH HAVE ONLY SECURED A SMALL PORTION OF THE REQUIRED FUNDING NEEDED TO COMPLETE THE PROJECT:**

The RTP/SCS, according to federal regulations, in "nonattainment and maintenance areas," (which includes the area covered by the RTP/RCS) must "address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance" (23 CFR § 450.322 (b) (11) (part)). Projects which only have secured a small portion of the needed funding, and which rely on speculative funding, such as potential and/or possible tolling authority, should not be included in the RTP/SCS, since this inclusion does not meet the federal requirements for a fiscally constrained plan.

**2. LANGUAGE SHOULD BE INCLUDED IN THE RTP/SCS REQUIRING A FULL COST/BENEFIT ANALYSIS FOR ALL PROJECTS IN THE CONSTRAINED PLAN:**

Language should be included in the RTP/SCS that clearly states that a full cost/benefit analysis shall be completed for each project contained in the RTP/SCS constrained plan. These cost benefit analyses should then be used, in an era of limited financial resources, to prioritize projects. A model for the cost/benefit analysis of every project in the RTP/SCS should be built and put into the Plan. The RTP/SCS should reflect this process and model in its language.

**3. SCAG SHOULD VIGOROUSLY PURSUE PROJECTS WHICH WOULD PROVIDE ENVIRONMENTALLY SUPERIOR ALTERNATIVES TO THOSE CURRENTLY IN THE PLAN IN ORDER TO BEST COMPLY WITH EXISTING ENVIRONMENTAL LEGISLATION:**

The PEIR states that: (1) *“Re-entrained roadway dust would increase proportionate to VMT. This would be a significant impact;”* (2) *“Impacts related to total GHG (Greenhouse Gas) emissions were determined to be significant even after mitigation.”*; (3) the PM10 Emissions Exhaust Only for Heavy Duty Trucks will increase (Table 3.2-4.); and (4) the *“Plan would result in a significant and unavoidable impact related to heavy-duty truck VHD [Vehicle Hours Driven], among other impacts.”*

SCAG should vigorously pursue projects under CEQA, the Clean Air Act, SB375 and AB 32 which would provide environmentally superior alternatives to those currently in the Plan, such as freight to rail mixed with additional transit. Additionally, sensitive receptors, such as schools and residences, must have adequate mitigation measures that, at a minimum, satisfy or exceed these legal requirements.

**4. MAJOR HIGHWAY EXPANSION PROJECTS SHOULD NOT BE FRONTLOADED IN THE RTP/SCS:**

The RTP/SCS frontloads highway modalities by disproportionately allocating funding and anticipated completion dates. This is evidenced by comparing Table 2.2 - *Major Highway Completion Project* against Table 2.5, *Major Transit Projects*, in chapter 2 of the RTP/SCS. Transit projects are built in segments with the final project not being completed until 2030-2035. Expanding highways induces VMT and therefore frontloading major highway completion before transit projects does not comply with the tenets of SB 375 and AB 32 to reduce greenhouse gas emissions by reducing VMT. Additionally, it is well documented that land uses adjacent to freeways are prone to increased toxins which cause negative health impacts.

According to SCAG staff, highway projects may be more easily financed than transit projects by borrowing against future toll revenues. They state that this is the reason that the highway projects are frontloaded. This financial reasoning does not justify sacrificing environmental concerns by building the highway projects prior to transit projects.

**5. THE TERM “SR-710 GAP CLOSURE” USED IN THE PLAN SHOULD BE SUBSTITUTED WITH “710 NORTH EXTENSION”:**

The “SR 710 Gap Closure” language, already in the 2008 RTP, should be modified to consistency with Metro’s stated intent, which should serve to ease, if not eliminate, the current polarizing language. The shift in title from “710 North Extension” to “710 Gap Closure” is invalid, since there is no gap. SR-710 terminates at Valley Boulevard. There is no northerly extension to connect to, since the portion of the 210 interchange including Del Mar Boulevard was built conditioned upon the fact that it “would have no effect on the decision as to the ultimate freeway location and will not foreclose alternatives to the proposed ultimate ...Freeway.” This title seems to create a sense of inevitability or priority for this project over competing ones and cannot be justified.

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SCAG assumes that the SR-710 extension will produce congestion relief and lower greenhouse gas emissions. These assumptions are not borne out by recent research, and there are a host of other previous studies showing that an increase in highway capacity increases VMT and that once the project is built, congestion, within a few years returns. These SCAG assumptions are flawed.

**7. THE DEFINITION OF THE SR-710 GAP CLOSURE PROJECT FROM ONE PRECISE POINT TO ANOTHER THREATENS PROGRAM-LEVEL CONFORMITY IN THE PLAN AND PREJUDICES FUTURE ENVIRONMENTAL ANALYSES:**

The Plan has modeled the SR-710 extension from one precise point north to another. Unfortunately, this assumption removes the low-build or multi-modal solution to the congestion problem. Under federal regulations, because of this specificity, the Plan and the PEIR threaten program-level conformity and prejudice future project-level environmental analyses.

In addition, this definition differs significantly from that used by the Los Angeles County Metropolitan Transportation Authority, which is currently conducting the EIR for the project and is the lead agency for the project. Metro says, "*We are beginning with a fresh perspective to initiate an environmental review process that will focus on a range of solutions to specifically evaluate the effects of the SR 710 gap. This process involves an education and public involvement program to seek both regional and community-based solutions that are suggested by you, your friends and family, your neighbors, and everyone else in your community. As our public involvement program name (SR-710 Conversations) suggests, the process for identifying these solutions will be through dialogue and conversation. These solutions from you can come in any possible form – from maintaining the status quo to considering new infrastructure, from single-modal to multi-modal approaches.*"

This project should not be characterized as a single solution. The solution to the congestion problem in the area of the proposed project should be multi-fold. It could include the Green Rail Intelligent Development (GRID) project, for example, along with better bus service, a multi-modal approach, a low-build option, better traffic light synchronization, a better intersection of the SR-710 and the I-10, or other projects.

The SCAG "project" should reflect the same process being currently used by Metro.

**8. THE SR-710 "GAP CLOURE PROJECT" SHOULD BE TAKEN OUT OF THE RTP/SCS ALTOGETHER DUE TO EMPIRICAL EVIDENCE OF HEALTH IMPACTS ON CHILDREN AND ADULTS ONCE THE PROJECT IS CONSTRUCTED:**

Dr. Rob McConnell, representing the USC Keck School of Medicine stated, "The increase in truck and automobile traffic on the I-210 freeway resulting from the proposed SR-710 extension would increase the exposure of surrounding communities to vehicular pollutants that may cause asthma and other respiratory diseases." Supported by empirical research, USC has also stated that there is an "emerging scientific consensus that residential or school proximity to major traffic corridors is associated with respiratory impairment in children and in adults." Further, it has been shown, in a 12-community Southern California study that a group of pollutants associated with residential proximity is a strong predictor of "debilitating lung disease and mortality in later life."

The City of La Cañada Flintridge has twelve schools in close proximity to the I-210, which would likely be impacted by the "SR-710 Gap Closure" project. These schools existed prior to the freeway being constructed and would be adversely impacted in the worst possible way by increased vehicular pollutants.

The Preliminary Final Draft of a SCAG study, done for the Arroyo Verdugo Region, called the "SR-710 Missing Link Truck Study," conducted by Iteris, Inc. Traffic Engineers, showed that there would be a 25% increase in daily traffic volumes on the I-210, that 30,000 incremental vehicles would go through the communities of La Cañada Flintridge, Pasadena, La Crescenta and Glendale, and that 2,500 of these would be heavy

duty trucks in peak hours (an incremental truck every four seconds). It can also be concluded from that study that 75% of local streets in the region, such as Fair Oaks Avenue, Fremont Avenue, Los Robles Avenue and Atlantic Boulevard would still be over capacity, as well as twelve arterial streets which would actually experience higher traffic volumes regionally as a result of the project. Additionally, the study showed that there would be more delay, gas consumption and air pollution as a result of the study (regionally). It can also be concluded as a result of the study that the system-wide, regional benefit would only be an increase of .6 miles per hour. Importantly, the study showed that motorists would still be driving farther and spending more time on the road if the tunnel is built.

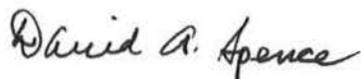
Regionally, a Metro study concluded that "in the peak (northbound) direction, the gap closure is projected to operate at LOS F..." This means gridlock in the proposed tunnel and idling at the portals, where congestion and air pollution already exist and should be alleviated rather than exacerbated.

The previously discussed SCAG conclusions that there would be lower greenhouse gas emissions and that congestion relief would be produced appear to lack foundation, in the face of one of its own studies, along with the others cited.

The City of La Cañada Flintridge wants to see the regional congestion problem resolved in a way that is the best solution for all stakeholders. We believe that this all-stakeholder congestion relief is possible, if you implement our comments, and particularly if you eliminate the "SR-710 Gap Closure" as the primary (if not the only) alternative in this particular region for congestion relief. Congressman Adam Schiff said, *"I believe the next logical step should be to consider a broad range of transportation options that might provide the same congestion relief and improvement in the quality of life for residents of the region at a cost equal to or lower than the amount Metro estimates it would take to build one of the five tunnel alternatives."* We concur with this statement.

Thank you for your consideration of our comments.

Sincerely,



David A. Spence  
Mayor

c: City Council Members, City of La Cañada Flintridge  
The Honorable Adam Schiff, Congressman  
Mark R. Alexander, City Manager



**Hector Madaraga**  
Director  
Environmental Affairs  
555 W 5th St  
Los Angeles, CA 90013



February 10, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

Dear Ms. Lin:

Southern California Gas Company (SoCalGas) respectfully submits these comments regarding the Southern California Association of Governments' (SCAG) 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

SoCalGas, a regulated utility of Sempra Energy has been delivering clean, safe and reliable natural gas to its customers for more than 140 years. It is the nation's largest natural gas distribution utility, providing service to 20.9 million consumers connected through nearly 5.8 million gas meters in more than 500 communities. SoCalGas's service territory encompasses approximately 20,000 square miles throughout Central and Southern California, from Visalia to the Mexican border. These comments address those portions of the RTP/SCS related to use of natural gas fuel in SCAG's region.

Our overarching concern and comment is that the RTP/SCS is not balanced in terms of options presented for alternative vehicle fuels. There is an obvious and inexplicable predisposition towards electric and zero-emission vehicles (ZEVs) without apparent backup documentation regarding the cost-effectiveness and feasibility of such an "all" electric strategy. We respectfully request that SCAG produce a more balanced and pragmatic RTP/SCS that truly considers both the short-term and long-term future of the region, by incorporating options for cost-effective, practical, and immediately available, alternative-fuel motor vehicles such as natural gas-fueled vehicles (NGVs).

Having a broad array of clean-fuel options makes sense for your member agencies given the diversity of your six counties and 191 cities. Many of your members have already made significant commitments to NGVs powered by clean, compressed natural gas (CNG), in terms of infrastructure, training and vehicle purchases. For example, as recently as last year, the LA County Metropolitan Transportation Authority retired its last diesel bus and now operates 2221 CNG-powered buses serving the communities comprising the County of Los Angeles. This important decision was made within the context of financially constrained budgets, especially given the order of magnitude higher cost for purchasing, operating and maintaining electric and

fuel-cell transit buses. Furthermore, since affordable near-zero vehicle technology is developing faster than fuel-cell and electric vehicle technology, it is imperative that more-effective, readily available, alternative-fuel options are included in the RTP/SCS as possibilities for all of your member agencies. SoCalGas would like to share data with SCAG staff on cost-effective, readily available near-zero vehicle technologies, such as NGVs.

In the spirit of assisting SCAG in developing the most comprehensive and legally defensible RTP/SCS, the discussion below provides support for why SCAG should incorporate options for cost-effective, practical, and immediately available alternative-fuel motor vehicles such as NGVs, in its RTP/SCS.

1. SB 375 (Steinberg, 2008) - Addressing Greenhouse Gas Emissions from the Transportation Sector via Regional Transportation Plans

The RTP/SCS needs to incorporate the use of other alternative-fuel vehicles, such as NGVs in order to fully meet all of SB 375's requirements. This is because SB 375 requires plans such as the RTP/SCS to be "*balanced*" and "*pragmatic,*" and to consider "*both the short-term and long-term future.*" Consequently, the RTP/SCS should incorporate cost-effective, practical, and immediately accessible alternative-fuel motor vehicles such as NGVs. The planning and infrastructure necessary for deploying electric and fuel-cell vehicles is an extremely resource-intensive and long-term process. Indeed, if the RTP/SCS were to mandate solely electric and fuel-cell vehicles, then SCAG would be making the same mistakes that CARB made when it implemented its Zero Emission Bus (Z-Bus) program ten years ago.

CARB adopted the Z-Bus program in 2000 as part of its Transit Fleet Rule which basically requires transit-bus fleets (with over 200 buses) to have by 2010, 15% of their new bus purchases be Z-Buses, such as battery-electric or fuel-cell buses, or electric trolleys. Over the last ten years, however, a number of demonstration projects conducted by a number of large transit agencies showed that these Z-Buses were very expensive, performed poorly, were unreliable, and its key components (batteries, fuel-cells) were extremely expensive to replace with a very short life span, e.g., a fuel-cell has a life span of 5,000 hours and costs over \$1 million to replace.

In September 2010, Foothill Transit took delivery of three battery-electric powered Z-Buses, costing \$1 million each. Each bus had a 30-mile range requiring a 10-minute recharge period. Worse, the recharging periods for these electric buses would occur during peak-electric periods when electricity is at highest cost and potentially overloading already strained California power grids. As a result, CARB is in the process of revising the Z-Bus rule to allow for greater flexibility and to give the bus-transit agencies more time.

Therefore, in order for the RTP/SCS to succeed in meeting the requirements of SB 375, it must take note of what CARB learned from its Z-Bus program and broaden its scope beyond just fuel-cell and electric vehicles, to include other alternative-fuel vehicles such as NGVs.

In addition, the RTP/SCS's current limitation of alternative-fuel vehicles to just fuel-cell and electric vehicles belies a narrow focus solely on tailpipe emissions. While it is true that ZEVs

have zero tailpipe emissions compared to near-zero or low-emission vehicles (LEVs) such as NGVs, it would not be accurate to say that ZEVs generate zero emissions overall compared to low-emission vehicles. For example, electric vehicles receive their power from generating facilities that also generate combustion emissions. Emissions are also generated by the processes used to manufacture the special batteries needed for such vehicles. These emissions cannot be ignored nor discounted, particularly with respect to attainment of the National Ambient Air Quality Standard for ozone, or contributing to any new “*or existing violation of any standard in any area.*”

Furthermore, there is efficiency loss using electrical power rather than directly using natural gas to power vehicles. Indeed, in the course of producing useful electric energy in the U.S., “we waste or discard about 70 percent of the initial raw energy found in coal or most other fuel sources.<sup>1</sup>” It is more energy efficient, therefore, less wasteful and less polluting to directly use natural gas to power vehicles rather than generating electricity transmitted long distances over power lines and then used to power an electric vehicle. Therefore, energy efficiency should be taken into account to fulfill the SB 375 requirement for “a balanced” and “pragmatic,” RTP/SCS.

## 2. AB 32 (Núñez 2006) - Global Warming Solutions Act

The RTP/SCS needs to broaden its scope beyond electric vehicles and incorporate the use of alternative-fuel motor vehicles such as NGVs in order to be fully consistent with the policy objectives of AB 32, which is an overall reduction of California’s greenhouse gases (GHG) emissions. As discussed above, energy is wasted when natural gas is used to generate electricity for electric vehicles, compared to natural gas used directly to power NGVs. In addition to this, using natural gas to generate electricity for electric vehicles creates more GHG emissions compared to natural gas used directly to power NGVs. This point is illustrated in a recent study which found that if you compared an electric-resistance water heater to a natural-gas water heater on a full fuel-cycle basis, the natural-gas water heater emits over 50 percent less CO<sub>2</sub> equivalent emissions annually.<sup>2</sup>

Furthermore, the RTP/SCS also needs to be consistent with the goals of AB 32’s low-carbon fuel standard (LCFS). The LCFS is designed to ensure the use of low-carbon transportation fuels in order to achieve the lower GHG levels intended by AB 32. This is achieved through the development of a carbon-intensity index which is measure of a transportation fuel’s GHG emissions generated through its life cycle, i.e., GHG emissions generated from obtaining the fuel’s raw materials, manufacturing the fuel, transporting the fuel from the producer to the ultimate consumer, and using the fuel. Electricity as a transportation fuel has a carbon-intensity index, as well as CNG, hydrogen, gasoline, and other transportation fuels.

If the RTP/SCS solely focuses on fuel-cell and electric vehicles, and excludes other alternate-fuel vehicles, such as NGVs that have lower carbon-intensity index values, it would be inconsistent

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<sup>1</sup> Cooper, Roger. (2011; p.6) *Natural Gas Reconsidered*. Progressive Policy Institute.

<sup>2</sup> American Gas Association. (2009; p. 16) *A Comparison of Energy Use, Operating Costs, and Carbon Dioxide Emissions of Home Appliances*. Policy Analysis Group.

with the broader GHG reduction goals of AB 32, which is the law that forms the very foundation for SB 375 and the SCS requirement.

3. AB 118(Núñez 2007), amended by AB 109 (Núñez 2008) - Alternative and Renewable Fuel and Vehicle Technology Program

Assembly Bill 118 created and authorized the California Energy Commission (CEC) to “*develop and deploy innovative technologies that transform California’s fuel and vehicle types to help attain the state’s climate change policies.*” With an annual budget of \$100 million, the CEC must accomplish this goal by, among other things, funding projects that provide for “*a measurable transition from the nearly exclusive use of petroleum fuels to a diverse portfolio of alternative fuels*” (emphasis added). Over the last three years, the CEC has allocated AB 118 funding to a variety of projects including, but not limited to, installing electric vehicle-charging stations, installing CNG dispensing facilities, deploying the use of heavy-duty natural-gas vehicles and promoting biofuels such as biomethane. For 2012-13, CEC is planning to spend \$2.5 million on new CNG refueling facilities, \$12 million for NGV incentives and \$20 million towards the production of biomethane.

In order not to undermine the gains made by AB 118 and devalue the substantial investments made by the CEC in CNG refueling infrastructure, NGVs, and biomethane, SCAG should incorporate a diversity of alternative-fuel motor vehicles into the RTP/SCS, including NGVs. It would be a sad waste of public funds and resources if the RTP/SCS did not become more diverse and better align its goals with those of AB 118.

4. CEQA - RTP/SCS Draft Program Environmental Impact Report (Draft PEIR)

SoCalGas appreciates the time and effort that SCAG has put forth in preparing the Draft PEIR for the RTP/SCS. SoCalGas nonetheless notes that SCAG’s focus on fuel-cell and electric vehicles in the RTP/SCS continues through in the Draft PEIR. For example, Section 2, Table 2-12 of the Draft PEIR contains a summary of the various modes of freight-movement strategies (taken from the RTP/SCS), together with the analysis which determine that significant emissions benefits could be achieved from the implementation of these different strategies. However, this modeling does not appear to take into account whether such savings could similarly be achieved with the inclusion of NGV’s. SoCalGas recommends that the analysis of the Draft PEIR be reconsidered and modified to the extent necessarily to include NGV’s as part of its implementation strategy. Additionally, SoCalGas recommends that SCAG’s revisions to the Draft PEIR give meaningful consideration to the cumulative impacts to air quality caused by the generation of the massive amounts of electricity that will be used to power the ZEVs as contemplated in the Project Description. Finally, SoCalGas recommends that the mitigation measures set forth in the Traffic, Safety and Security element of the Draft PEIR (Section 3.12) make clear that NGV’s should be included in any mitigation measure or strategy that includes a call for LEVs or ZEVs. Doing so would help ensure that mitigation measures are entirely feasible and capable of real impact minimization.

SoCalGas commits to assisting SCAG to include additional fuel options in the RTP/SCS, as we are similarly committed to protecting and conserving the environment for our employees, our customers and the diverse communities in which we operate and provide service. We look forward to additional discussion and sharing data with your agency on the topics discussed above.

Sincerely,

Hector Madariaga  
Director Environmental Affairs

Attachments:

1. Cooper, Roger. (2011; p.6) *Natural Gas Reconsidered*. Progressive Policy Institute.
2. American Gas Association. (2009; p. 16) *A Comparison of Energy Use, Operating Costs, and Carbon Dioxide Emissions of Home Appliances*. Policy Analysis Group.



February 7, 2012

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[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). Friends of Harbors, Beaches, and Parks (FHBP) is based in Newport Beach and we work to protect the natural lands, waterways, and beaches of Orange County. Our organization includes support from more than 80 conservation and community groups in the regional and thousands of Orange County residents.

FHBP would like to applaud SCAG's efforts to include a regional advanced mitigation component in the RTP/SCS. This letter serves to offer suggestions mainly to strengthen this component, which closely links with the sustainability principle listed in the document's vision statement. We do, however, offer a few other suggestions as it relates to other projects we are interested in.

**Active Transportation (p. 21 of the Draft 2012 RTP/SCS)**

In 2011, FHBP completed a study documenting the Walk Score for the city hall of each Orange County city as well as the city-wide average. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for walking. According to its website, WalkScore.com uses Google maps to compute the distance between residential addresses and nearby destinations. The algorithm looks at 13 categories and awards points for each between ¼ to 1 mile. Amenities within ¼ mile receive maximum points, while no points are awarded for amenities further than one mile. The categories include, grocery store, coffee shop, movie theatre, park, bookstore, drug store, clothing and music store, restaurant, bar, school, library, fitness, and hardware store.<sup>1</sup> See attachment #1 for the results of this Walk Score study.

**Recommendation #1**

We recommend utilizing this tool as a measurement of how and where walkable, bikable communities may be most relevant. This information may serve SCAG well in determining or prioritizing funding for more active transportation opportunities. Of course, we understand that many factors are at play including site development, existing stable neighborhoods, transit areas and more, but including as a metric how communities are doing already is helpful information to have in the overall analysis.

**Regional HOT Lane Network (p. 58 of the Draft 2012 RTP/SCS)**

We disagree that the Toll Road Agencies proposed extension of the 241 South be included in the Regional HOT Lane Network. The RTP includes the proposed 16-mile Foothill-South Toll Road extension, which would run through the heart of San Onofre State Beach Park, a beloved and popular recreation spot in south Orange County that serves more than 2.4 million visitors each year. Both the California Coastal Commission and the U.S. Department of Commerce have rejected the Foothill-South project on the basis of its devastating projected impacts on coastal resources.

**Recommendation #2**

The continued inclusion of this unbuildable project as a baseline roadway changes the transportation modeling for southern Orange County transportation projects. The Foothill-South should be eliminated from the baseline scenario and removed from the RTP, especially since it is in the unconstrained plan of the Orange County Transportation Authority's Long Range Transportation Plan.

**Conservation Planning Policy (p. 76 of the Draft 2012 RTP/SCS)**

While we wholeheartedly support the concept of the conservation planning policy, which helps demonstrate progress and safety in SAFETEA-LU requirements, however we do not agree large-scale

<sup>1</sup> Walk Score. Retrieved 2 Feb 2012 from the WalkScore website: <http://www.walkscore.com>.

acquisition and management of *critical habitat* be the only type of mitigation opportunity utilized. We note however, this may simply be a word choice issue. According to the U.S. Fish and Wildlife Service: "when a species is proposed for listing as endangered or threatened under the Endangered Species Act (Act), we must consider whether there are areas of habitat we believe are essential to the species' conservation. Those areas may be proposed for designation as "critical habitat."<sup>2</sup> Essentially, we firmly believe there are other important natural lands deserving of conservation/preservation, but do not or may not contain a "critical habitat" designation (as defined by the Service).

### **Recommendation #3**

With this in mind, we suggest changing the reference from critical habitat to important natural lands. This comment also applies to the Resource Area and Farmland section (pg. 128 of the Draft 2012 RTP/SCS).

#### Engage in a Strategic Planning Process

We would also like to offer that it may be an important first step to create a regional Greenprint in addition to a map of regional priority conservation areas. According to Oregon State University: "A Greenprint is a non-regulatory vision to help communities make informed decisions about land conservation, scenic values, and recreation priorities. Components include:

- A comprehensive overview of important natural resources, wildlife habitat, historic sites, scenic values, and potential/existing trail connections in the region
- Maps that highlight the ecological and recreation priorities of the region, while respecting property rights and creating awareness around public access
- An inclusive vision to foster discussion of the diverse conservation and recreation needs of the region."<sup>3</sup>

### **Recommendation #4**

We request a region-wide Greenprint be conducted to document the natural, recreational, agricultural, and other resources in the SCAG jurisdiction as part of the conservation policy planning.

#### Identify Map Priority Conservation Areas and Engage Various Partners

While we understand the RTP is directly related to County Transportation Commissions (CTCs) we would respectfully request that conservation organizations and other related agencies, conservancies, and joint power authorities, like the Santa Monica Mountains Conservancy, Mountains Recreation and Conservation Authority, and the Wildlife Corridor Conservation Authority, be included in determining priority conservation areas and plan development. CTCs, with all due respect, do not tend to focus on conservation of natural lands.

As the Orange County Transportation Authority will confirm, it relied upon many sources for establishing its priority conservation areas under the Environmental Mitigation Program of Renewed Measure M. To that end, FHBP would like to offer its assistance with Orange County's potential conservation lands as we've created a county-wide map, the Green Vision Map, that documents important conservation lands and existing privately or publicly protected lands. In addition, we believe there are similar conservation non-profit organizations and entities throughout the SCAG region that could provide useful, beneficial, and relevant information about their on-the-ground priorities.

### **Recommendation #5**

We recommend that SCAG incorporate public workshops and outreach to effectively gather information from conservation organizations and other related agencies on conservation priorities. This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (pg. 128 of the Draft 2012 RTP/SCS).

#### **Locations for Mitigation (pg. 78 of the Draft 2012 RTP/SCS)**

We are pleased that SCAG has already inventoried the locations of the protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park, and recreation areas. We agree the maps should be updated as a function of the post-RTP planning efforts but qualify this statement with the caveat that not all of the protected, or undeveloped unprotected lands, in Southern California are within a Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) area.

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<sup>2</sup> United States Fish and Wildlife Service (USFWS). "Critical Habitat: What Is It?" Retrieved 1 Feb 2012 from the USFWS website: [http://www.fs.fed.us/r9/wildlife/tes/docs/esa\\_references/critical\\_habitat.pdf](http://www.fs.fed.us/r9/wildlife/tes/docs/esa_references/critical_habitat.pdf).

<sup>3</sup> Oregon State University Libraries. "What is a Greenprint?" Retrieved 1 Feb 2012 from the Deschutes Basin Explorer Natural Resources Digital Library website: <http://oregonexplorer.info/deschutes/Greenprint/WhatisaGreenprint>.

### **Recommendation #6**

We recommend not only updating the maps to include more recent acquisitions in the NCCP/HCP areas, but also recommend including preserved lands not in the NCCP/HCP areas. For example, most of Chino Hills State Park is not included in an NCCP/HCP but this park offers more than 14,100 acres of natural lands to the inventory. To exclude non-NCCP/HCP lands would misinform decisions about conservation priorities and exclude an entire network of preserved lands outside of, but often times critical to the functioning of, our entire open space system.

In addition, the Orange County Transportation Authority has created a county-wide NCCP/HCP for its Environmental Mitigation Program. This new NCCP/HCP is above and beyond the existing NCCP/HCP areas (Central/Coastal and Southern). By limiting the view of where mitigation can occur (to only existing NCCP/HCP areas), SCAG is considerably reducing its potential mitigation sites especially in light of the broad and expansive nature of the RTP. Freeways crisscross the entire SCAG region and have impacts that cannot or may not be able to be mitigated in an existing NCCP/HCP, nor may SCAG or CTCs be able to add themselves as a partner this late in the NCCP/HCP process.

### **Recommendation #7**

Instead of dictating the conservation mechanism or program to be used by the individual CTCs, we recommend allowing the implementing CTC determine the best conservation mechanism for its region with appropriate public input and guidance from the resource and permitting agencies.

We agree SCAG does not have the authority to purchase or manage these conservation lands, but disagree that the conservation areas will be “achieved through already-established programs.” This statement limits the opportunities for conservation to just Orange County as it is the only transportation agency in the SCAG region to have an advanced mitigation component. Should you mean you will use already-established programs to build upon SCAG’s efforts, we agree with this approach, but it is not clearly stated and should be revised.

### **Recommendation #8**

We recommend augmenting the statement to include not only already-established programs, but also programs that may be developed in the future or created within existing transportation measures (where appropriate). Additionally, it may be a good exercise to understand what modifying existing transportation measures to incorporate a regional advanced mitigation program would entail.

### **Types of Mitigation Activities (pg. 79 of the Draft 2012 RTP/SCS)**

By reducing transportation impacts to sensitive lands and encouraging smart land use decisions SCAG is moving in a direction that we believe will become the norm and an adopted policy at the statewide level—planning our transportation projects with a comprehensive mitigation program that ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity.

### **Recommendation #9**

We did notice the lack of mention of wildlife linkages in this section and based on our experiences in Orange County recommend their inclusion. Wildlife linkages are also an important conservation component to ensure the health of our open space areas.

We are pleased to say that the Renewed Measure M Ordinance defines Programmatic Mitigation as “permanent protection of areas of high ecological value, and associated restoration, management and monitoring, to comprehensively compensate for numerous, smaller impacts associated with individual transportation projects. Continued function of existing mitigation features, such as wildlife passages is not included.”<sup>4</sup> In other words, if freeway projects impact existing wildlife corridors, funding to ensure its continued function may not come from the programmatic mitigation component. In addition, the program will establish an “accounting process for mitigation obligations and credits that will document *net environmental benefit* from regional, programmatic mitigation in exchange for *net benefit in the delivery of transportation improvements* through streamlined and timely approvals and permitting” [emphasis added].<sup>5</sup>

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<sup>4</sup> Orange County Local Transportation Authority. “Ordinance No. 3.” 24 July 2006. Section I, Item P, page B-2.

<sup>5</sup> Orange County Local Transportation Authority. “Ordinance No. 3.” 24 July 2006. Section II Item A.5.iii, page B-5.

### **Recommendation #10**

We do, therefore, recommend that maintaining existing and future wildlife corridors or linkages be included as a type of mitigation activity and that the advanced mitigation program incorporates language to ensure a *net* environmental benefit as there will be a *net* benefit in completing the transportation projects.

### **Recommendation #11**

While we recognize there are many options to how the mitigation program gets developed, we do recommend that the summary language acknowledges that the list of types of measures is not exhaustive.

### **Farmland and Agricultural Resources**

We urge you to consider adding farmland and other agricultural resources to the conservation policy. In comparing acreages of farmland in the SCAG region, there was a loss of nearly 64,000 farmland acres because of its conversion to urban uses between 2002 and 2008. There was also a 47,000 acre decline in prime statewide important and unique farmlands (as designated by the Farmland Mapping and Monitoring Program classification system).<sup>6</sup> Urban uses generally equate to additional greenhouse gas emissions due to auto-centric developments and therefore go against the mandate of SB 375.

We believe existing agricultural lands play into the larger network of open spaces. Farmlands, like natural lands, create opportunities for natural recharge of the groundwater, reduce the effects of urban heat islands, and provide refuge and foraging areas for wildlife. Of course, agricultural lands also provide food production (worth \$4.6 billion per year in the SCAG region) and jobs (67,000 with an annual payroll of \$800 million), while producing many times less greenhouse gases than the urban development that has been supplanting them.

### **General Mapping**

It unfortunately seemed to be a trend that the maps in the RTP/SCS were illegible in both printed and digital form. It would be helpful to revise the maps contained within the documents so that the public can accurately read and understand what the maps are trying to show. We were particularly interested in the following maps but our comments are limited due to readability (pixelation) issues: the projected population growth (Exhibit 4.1), housing growth (Exhibit 4.2), employment growth (Exhibit 4.3), natural resource areas (Exhibit 4.6), open space (Exhibit 4.7), and farmland maps (Exhibit 4.8).

### **Forecasted Growth**

We applaud your goal of the RTP/SCS to focus on (among other goals): A land use growth pattern that accommodates the region's future employment and housing needs, and protected sensitive habitat and natural resource areas. We agree land use, transportation AND habitat protection can all be achieved through innovative, smart and new programs like the proposed advanced mitigation policy.

We also appreciate that the land consumption of the greenfield areas consumes 408 square miles less than the baseline. And yes, we agree it is more expensive to develop in greenfield areas because of the lack of infrastructure and services. We are pleased to see SCAG promoting infill projects and protecting our remaining greenfields through compact development and improved land use planning. We believe these concepts are all moving in the right direction toward achieving our mutual goals and the goals outlined in the RTP/SCS for mobility, economy, and sustainability.

### **Rapid Fire Model**

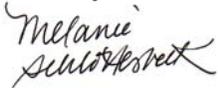
Rapid Fire Model Regional Scenarios Summary which outlines the results of the impacts of varying land use patterns, transportation investments, and policy directions on greenhouse gas emissions, air pollution, water and energy use, land consumption, and infrastructure cost is an excellent method to evaluate how decisions will impact the region. We are pleased to see SCAG utilizing this tool.

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<sup>6</sup> U.S. Census of Agriculture; Cal Farmland Mapping & Monitoring Program.

Thank you for the opportunity to provide feedback on the Draft 2012 RTP/SCS and the PEIR. We look forward to working with you in the future on the SCS and the conservation policy.

Sincerely,

A handwritten signature in black ink that reads "Melanie Schlotterbeck". The signature is written in a cursive style with a large initial "M".

Melanie Schlotterbeck  
Green Vision Outreach Coordinator  
Friends of Harbors, Beaches and Parks  
714-779-7561

cc: Jacob Lieb, SCAG

# Orange County Walk Scores



## ORANGE COUNTY'S TOP 3 MOST WALKABLE CITIES

1. Costa Mesa (76)
2. Stanton (74)
3. Cypress (70)



### Walkable Neighborhoods

Imagine living in a community that's design and layout allowed you to get to the bank, the grocer, and the post office without your car. Imagine not only asking your realtor about the number of bedrooms and baths, but also what the Walk Score is for the property.

"Walkable neighborhoods offer surprising benefits to the environment, our health, our finances, and our communities," according to Walk Score, a consortium of planners and environmental experts whose mission is to promote more walkable neighborhoods. It further explains that towns that have walkable neighborhoods experience reduced pollution, increased public health, higher property values, and more community involvement.



### Walkable Neighborhood Features

- They have a "center," be it a main street or public space
- There are enough people to allow businesses to thrive and transit to operate frequently
- Mixed income and mixed uses are near businesses
- People have nearby places to recreate in
- Buildings are close to the street and parking is in the rear
- Residents can walk to work and school
- Streets accommodate bicyclists, walkers, and transit



### Orange County Walk Scores

For our purposes Friends of Harbors, Beaches, and Parks looked at the Walk Score for the city hall for each Orange County city because it is often in the "downtown." And then we looked at the average that was calculated by the Walk Score website. Interestingly, these numbers may be very different numbers. For each city's Walk Score (both city hall and the city's average) see the reverse side of this flyer.



### Measuring Walk Scores

Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for walking. "Walk Score uses Google maps to compute the distance between residential addresses and nearby destinations." The algorithm looks at 13 categories and awards points for each between ¼ to 1 mile. Amenities within ¼ mile receive maximum points, while no points are awarded for amenities further than one mile. The categories include, grocery store, coffee shop, movie theatre, park, bookstore, drug store, clothing and music store, restaurant, bar, school, library, fitness, and hardware store.

For a detailed description of the algorithm, please see the Walk Score Methodology white paper found at:

<http://www.walkscore.com/professional/methodology.php>.



*Friends of Harbors, Beaches, and Parks works to protect the natural lands, waterways, and beaches of Orange County.*

[www.FHBP.org](http://www.FHBP.org)



Dayle McIntosh Center

# City Hall and City Average Walk Scores

City	Walk Score of City Hall	Average Walk Score for the City
Aliso Viejo	85	52
Anaheim	94	63
Brea	82	63
Buena Park	63	68
Costa Mesa	71	76
Cypress	63	70
Dana Point	51	61
Fountain Valley	72	65
Fullerton	86	69
Garden Grove	71	69
Huntington Beach	72	67
Irvine	72	60
La Habra	82	68
La Palma	72	67
Laguna Beach	98	53
Laguna Hills	80	59
Laguna Niguel	72	53
Laguna Woods	55	52
Lake Forest	35	53
Los Alamitos	68	49
Mission Viejo	75	53
Newport Beach	100	63
Orange	92	63
Placentia	51	60
Rancho Santa Margarita	91	46
San Clemente	78	55
San Juan Capistrano	74	47
Santa Ana	82	65
Seal Beach	95	52
Stanton	71	74
Tustin	88	64
Villa Park	65	49
Westminster	78	66
Yorba Linda	83	46

Note: These Walk Scores were calculated via the [www.WalkScore.com](http://www.WalkScore.com) website tool.



February 3, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

**Re: Comments on the Draft 2012-2035 Regional Transportation  
Plan/Sustainable Communities Strategy**

Dear Ms. Lin:

On behalf of the Port of Long Beach, thank you for the opportunity to review and comment on the draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including the Goods Movement Report contained within the RTP/SCS and the draft Program Environmental Impact Report. In general, we find these reports are well-written and accurate with respect to maritime activities. We would like to offer one minor correction.

Maritime Ports

The statistic for the Ports of Long Beach and Los Angeles in the second paragraph, second sentence of the PEIR on page 3.12-15 is incorrect. The ports of Long Beach and Los Angeles combined are the world's sixth-busiest port complex in 2011 (15.8 million total TEU), after Singapore (23.2 million TEU), Hong Kong (22.4 million), Shanghai (18.1 million) and Shenzhen, China (16.2 million).

As noted in the PEIR, 34% of the jobs in the region depend on the goods movement industry. However, our region, with a combined population over 18 million residents, is bearing the brunt of traffic congestion, safety and air quality impacts. The Port of Long Beach is committed to developing programs that will support the anticipated growth in trade activities with minimum impact on the region's environment. The Port cannot do it alone –

**Ms. Margaret Lin**  
**February 3, 2012**  
**Page 2**

and we stand ready to work with you in implementing programs envisioned in the Regional Transportation Plan/Sustainable Communities Strategy.

Should you have any questions, please feel free to contact me at (562) 283-7180.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Shen", with a long horizontal flourish extending to the right.

Eric C. Shen, P.E., PTP  
Director of Transportation Planning



The Port of  
**LONG BEACH**

February 10, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

**Re: Additional Comment on the Draft 2012-2035 Regional Transportation  
Plan/Sustainable Communities Strategy**

Dear Ms. Lin:

In addition to the comment that the Port of Long Beach provided dated February 3, 2012, the Port has one additional comment on the draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

California Coastal Trail

Please revise the map shown as Exhibit 19 to reflect the Coastal Trail route connecting San Pedro and Long Beach via Terminal Island. This is consistent with recent plans to include a Class 1 Bike Path as part of the Gerald Desmond Bridge Replacement Project, including Coastal Commission's condition of approval on the Harbor Development Permit for the project. The Class 1 Bike Path is also consistent with both the cities of Los Angeles and Long Beach Bicycle Master Plans.

Thank you for your consideration of this comment.

Should you have any questions, please feel free to contact me at (562) 283-7180.

Sincerely,



Eric C. Shen, P.E., PTP  
Director of Transportation Planning

**Stephanie Johnson**  
[REDACTED]  
**San Marino, California**  
[REDACTED]

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February 11, 2012

Ms. Margaret Lin  
SCAG  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017  
RTP@scag.ca.gov

**Re: Southern California Association of Governments  
2012-2035 Regional Transportation Plan/Sustainable Communities Strategy  
December 2011**

Thank you for the opportunity to comment on the *SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*. The Plan states as its goal “improving the quality of life for our residents”.

*The 2012 RTP/SCS will transform the region, serving as a blueprint for **improving quality of life for our residents** by providing more choices for where they will live, work, and play, and how they will move around.*

*The 2012 RTP/SCS proposes investing over \$500 billion over the next 25 years to **improve the quality of life of the region’s residents** by enhancing our transportation system.*

While I agree that improving the quality of life for the residents is an admirable goal, the Plan as indicated by the SCS City maps, will denigrate the quality of life for the residents of San Marino. My comments regarding the 2012-2035 RTP are limited to where I live, Los Robles Avenue in San Marino, and the adjacent area.

While reviewing the Resources > SCS Map Tool from the SCAG web site, <http://rtpscs.scag.ca.gov/Pages/SCS-Maps-Tool.aspx>, I was shocked to discover that Los Robles Avenue in San Marino has been designated a **High Quality Transit Corridor**.

The SCAG RTP Plan indicates that:

*A HQTAs (High Quality Transit Area) is generally a walkable transit village, consistent with the adopted SCS that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well serviced transit stop, and includes transit corridors with minimum 15 minutes or less service frequency during peak commute hours.*

Los Robles Avenue in San Marino is a 7/8 of a mile, two lane narrow street fronted exclusively by single family homes where children live and play. The homes, built between 1920 and 1950, and the set back is close to the street. The posted speed limit is 30 mph., the posted weight limit is three tons, and truck traffic is prohibited. The City of San Marino General Plan, classifies Los Robles Avenue as a residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street. There is no bus service.

How then, was Los Robles Avenue in San Marino designated a HQTAs? I posed this question to both the City of San Marino staff and City Council. They were unaware of this designation in the proposed RTP

SCAG – 2012-2035 Regional Transportation Plan – December 2011  
Johnson – February 11, 2012

Plan. I also made inquiries of SCAG staff and was told that the Map for San Marino was incorrect with regard to bus stops, because no bus route is planned for the street.

**RE: Records Request - SCAG 2012 RTP project**

From: **Christopher Tzeng** (tzeng@scag.ca.gov)  
Sent: Thu 1/12/12 4:16 PM  
To: Stephanie Johnson [REDACTED]

Hi Ms. Johnson,

Per your inquiry, we have looked into planned bus routes along Los Robles in the City of San Marino for the 2012-2035 Regional Transportation Plan (RTP).

We checked our 2035 transit network that has been developed for the 2012-2035 RTP and there are not any proposed transit services on Los Robles Avenue in the City of San Marino in the 2035 constrained plan network. Therefore, the bus route should not appear in the SCS Maps Tool viewer you were utilizing. Thank you for bringing this to our attention.

The maps you are able to view on the Maps Tool use data from SCAG's Regional Transportation Demand Model. This is utilized to predict the impact of travel growth and evaluating potential transportation improvements for all cities within the SCAG region, which consists of 191 cities, six counties and more than 18 million residents. The Transportation Demand Model comprises a large number of data files in order to represent the many facets of the transportation environment.

Please let me know if you have any questions. Again, thanks for bringing this to our attention.

Regards,

Chris

## **RE: SCAG RTP2012 - plans for bus routes in San Marino and Pasadena**

From: **Abrishami, Lori** [REDACTED]  
Sent: Fri 9/02/11 3:58 PM  
To: 'Stephanie Johnson' [REDACTED]

Ms. Johnson,

I am sorry, but when I log in, I do not get the same map as you. Can you please tell me what a HQTC is? I believe that the SCAG definition of High Quality Transit Corridor, as well as some agreement in the transportation planning profession, means an area within ½ mile of transit service that runs every 15 minute or more often. If you are within ½ mile of Colorado Blvd, or the Lake Ave. Gold Line Station, then that is within an HQTC.

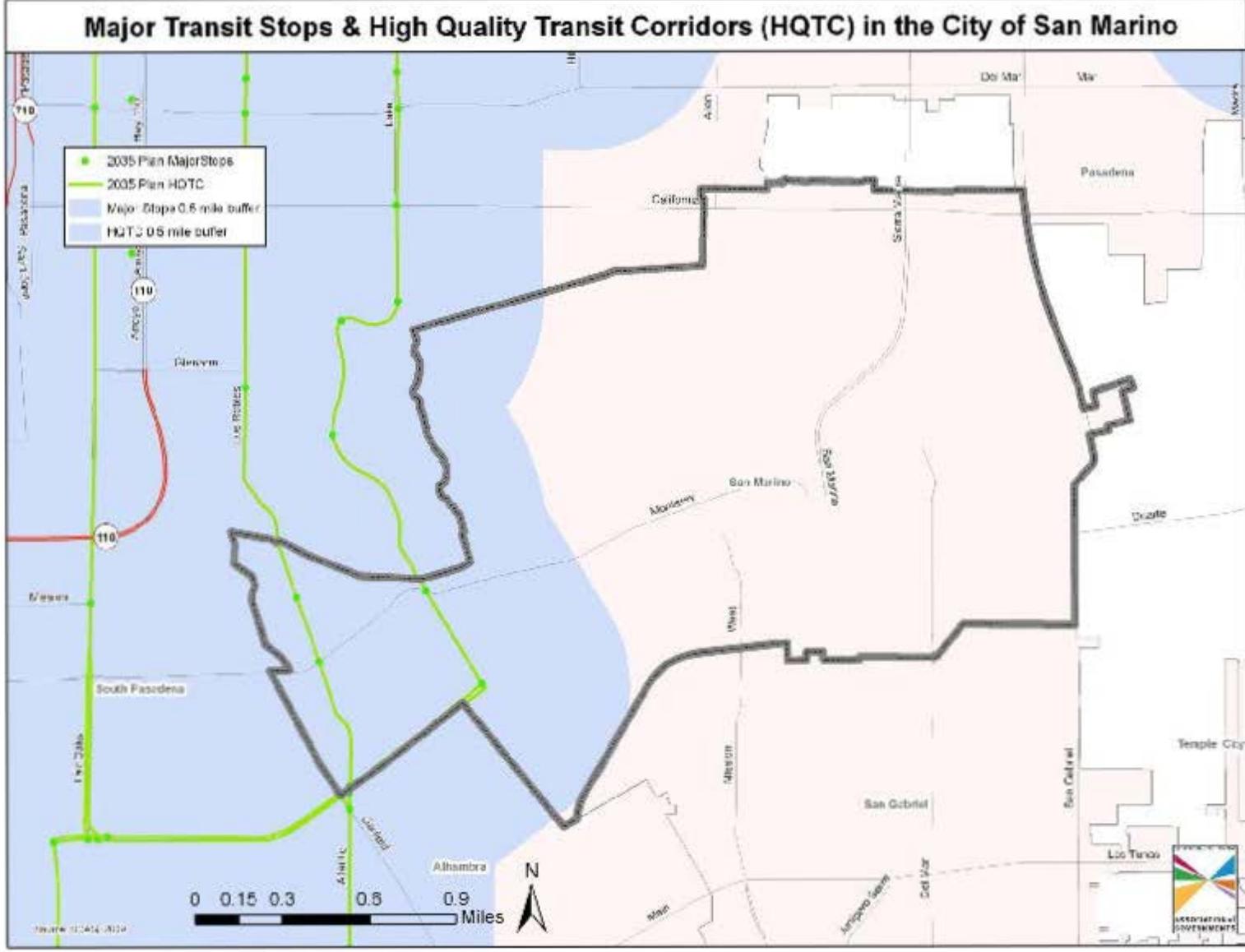
Since the online map on my screen is not showing the bus route detail that yours shows, please tell me the route number of the bus route shown on Los Robles. As you know, we do not have one, and the data that our modelers sent to SCAG modelers only has our current routes on it. So, the bus route is not ours. I would not want to request that it be removed, since it may be the City of Pasadena or other nearby municipal operator.

Lori Abrishami

Below are copies of the SCAG SCS Maps for San Marino, Alhambra, South Pasadena and Pasadena. It is not clear why certain streets have been designated HQTC and others have not.

### SCAG Map for San Marino – High Quality Transit Corridors (HQTC)

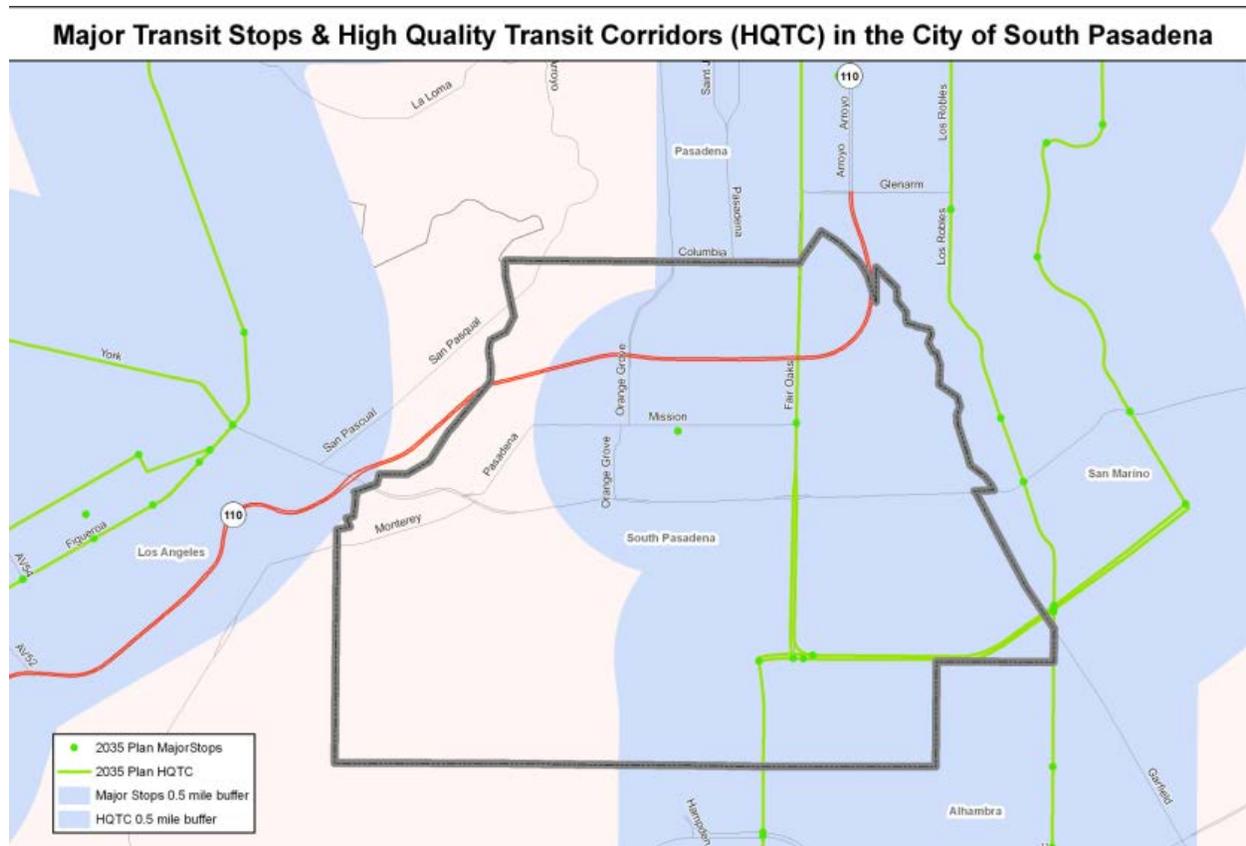
This map indicates that Los Robles is a HQTC with bus stops.



## South Pasadena

Note that although Fremont Avenue is designated a HQTC in Alhambra, it is not in South Pasadena, although the street merges into S. Pasadena Avenue that is the freeway entrance to the 210 and 134 freeways in Pasadena.

Garfield Avenue has a METRO bus route that extends through South Pasadena that stops at the Gold Line Mission Street station.



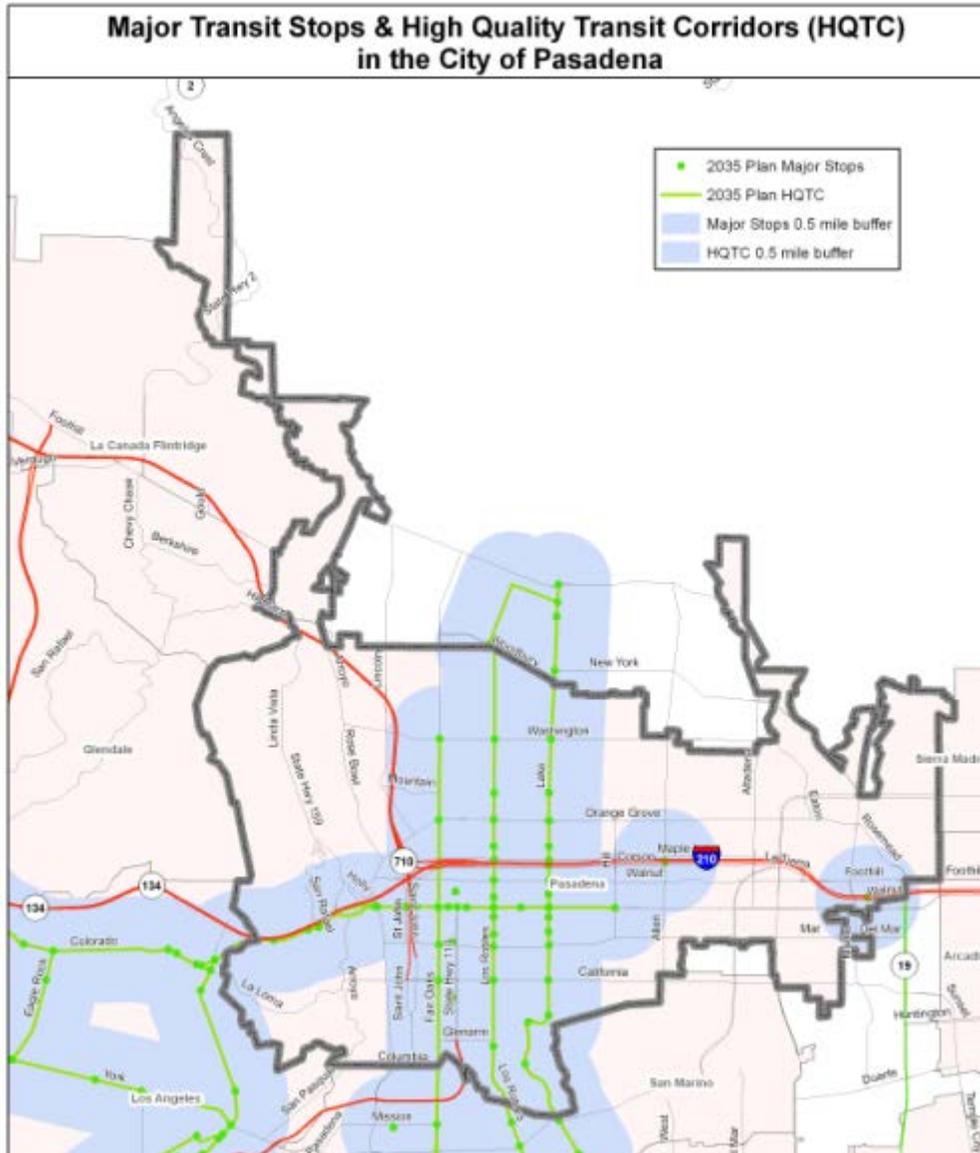
## Alhambra

Why is Garfield Avenue not designated a HQTC? It is a major arterial in Alhambra and has a bus routes that extends through South Pasadena that stops at the Gold Line Mission Street station.



## Pasadena

Note that both Los Robles Avenue and Oak Knoll Avenue in Pasadena, south of California Boulevard, are single family residential areas.

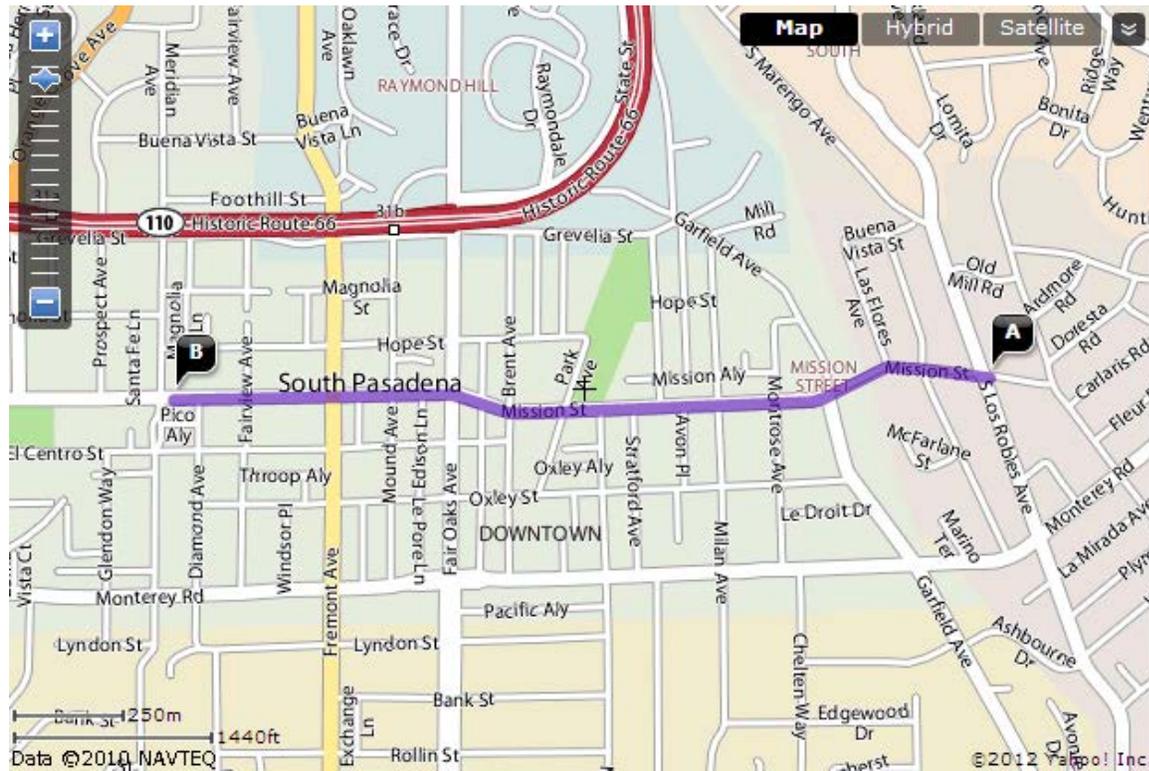


### Alhambra, South Pasadena, San Marino, Pasadena

Fremont marked in purple for reference purposes.



Los Robles Avenue, San Marino to Gold Line Station Mission Street, South Pasadena 1.1 miles



If regional planning is to be based upon the SCS maps, then further information regarding how the HQTIC attribute was assigned to streets must be made public. Los Robles Avenue in San Marino does not meet the definition of an HQTIC. Regional traffic should not be directed toward the street, exacerbating the existing cut through traffic and its resulting negative impacts upon the residents.

Sincerely,

Stephanie Johnson

Southern California Association of Governments  
Attention: Margaret Lin  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: draft SCAG 2012-2035 regional transportation plan/ SCS and PEIR

**The SCAG PEIR / RTP is flawed in the same way as the SANDAG RTP / EIR – they are inadequate under CEQA law.**

The joining motion filed by the Attorney General of the State of California in the lawsuit against the San Diego Association of Governments (SANDAG) Regional Transportation Plan states that the Environmental Impact Report (EIR) prepared for the plan does not adequately analyze or prevent air pollution and climate concerns, and prioritizes expanding freeways while delaying public transit projects.

The SCAG is similarly flawed and will not stand up to CEQA challenge.

**I oppose all items in the draft RTP that recommend the expansion or extension of highways, for the following reasons:**

The fundamental law of highway congestion (Anthony Downs, 1962, 2004, 1992; and confirmed most recently by Gilles Duranton and Matthew Turner of the University of Toronto ) states that the travel speed of an expanded highway reverts to its previous level before the capacity expansion and that the extension of interstate highways is met with a proportional increase in traffic in the U.S.

SCAG's assumption that highway expansion reduces congestion and improves pollution levels is grossly inaccurate. The traffic modeling fails to fully account for generated and induced traffic. And therefore exaggerates the benefits of expansion and the does not reflect the severity of future congestion problems.

The draft RTP anticipates adding 948 centerline miles and 7419 lanes miles which would be a 4.4% and 11.1% increase respectively.

The SCAG RTP will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks throughout the Southern California region.

**I oppose the 710 gap closure project as it is un-defined and is not eligible to be on the Constrained Plan.**

The proposed SR-710 Extension Toll Tunnels, at \$5.6 BILLION already underfunded by at least 50%, must be moved from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law for inclusion in the Constrained Plan.

There is enormous internal inconsistency with the SCAG's six possible construction zones yet all actual estimates based only the previously defined Meridian Route alignment.

**I oppose plan items in the draft RTP that recommend increased conventional roadway and rail yard capacity for goods movement. The RTP should instead include existing zero-emission goods movement alternatives.**

Goods movement must be accomplished via electrified freight rail not trucks.

Goods movement proposals in the draft RTP are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan.

The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (p. 68) and negative impacts in neighboring communities and throughout the region.

However, the plan allocates billions of dollars to expanding conventional goods movement, saying “truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety.and provide a platform for the introduction and adoption of zero-emission technologies.”

Yet the plan does not require zero-emission technology.

Regards,

Judy Bergstresser

South Pasadena, CA

Carol Teutsch, M.D.  
Los Angeles, CA [REDACTED]  
February 13, 2012

Southern California Association of Governments  
Attention: Margaret Lin  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, Ca 90017

Sent via email [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

Dear Ms. Lin,

Thank you for the comprehensive SCAG RTP currently in draft format. I have viewed your video and attended one of your public meetings. Many of the comments offered in the public forum reflected interest in the **active transportation elements** and **delayed funding** for implementing these concepts which I am sure you took note of and which reflect my own priorities. Having **individual mobility on freeways as a key objective is not sustainable** and we should shift away from that as a priority.

I am a physician deeply interested in the environment and in the impact of our environment (built and natural) on our health. **TRANSPORTATION IS HEALTH**. I am delighted with the Health in All Policies document put in place for the state by our former governor, but feel its careful recommendations are not being given adequate prioritization in your thinking. [www.sgc.ca.gov/workgroups/hiap.html](http://www.sgc.ca.gov/workgroups/hiap.html)

I am new to southern California, having moved here from the east coast. The area is captivating and we need to protect it—not pave over more of it and not continue to building polluting solutions.

I would like to see to health risk and health impact assessments as part of your standard operating plan development. The externalities of health and environmental impact must be known because they affect long costs and benefits, which is your responsibility in these long term plans.

A very nice and recent example of integrating public health objectives in transportation planning can be seen in an independent research report from the Victoria Transport Policy Institute ([www.vtpi.org](http://www.vtpi.org)) (<http://www.vtpi.org/health.pdf> accessed March 27, 2011).

I know that cargo movement is an essential part of your plan. Investing now in better options that are zero emission is key to the region's long term success. We could implement the "greenest" port in the world, helping our region, our citizens' health and demonstrating leadership for the world. There is concern about whether trucking is an appropriate choice for cargo transport and inappropriately subsidized by not accounting fully for externalities. The new GAO Report GAO-11-134 showed that " on average, additional freight service provided by trucks generated significantly more costs that are not passed on to consumers of that service than the same amount of freight service provided by either rail or water." This report puts an additional burden on SCAG to consider alternatives such as rail and appropriately include consideration of all externalities.

(Full report at <http://www.gao.gov/new.items/d11134.pdf>



d11134high.pdf

The tunnel proposal is of special concern to me since I live in Northeast LA. We will be bringing a corridor of damaging health effects up this way instead of solving the problem in the south 710 region. We see increasing proof of adverse health effects of ultrafine particles and no means to remove them in tunnel exhausting. We also need to see a robust model of costs of running tunnel ventilation which is very expensive. I have many additional references on tunnels and how they concentrate pollutants if you need them. The large ventilation shafts in residential areas are visually and from a health perspective undesirable. We also attract trucks to our roads which are not held to the same pollution standards---from Mexico and in construction. I would like you to directly address these issues in your RTP.

We are all concerned about jobs. The link provided is by a highly respected transportation expert and deals with questions of jobs [http://www.uctc.net/access/38/access38\\_transportation\\_growth.shtml](http://www.uctc.net/access/38/access38_transportation_growth.shtml).

You have a difficult job, but it is clear that you can never build your way out of the terminal congestion we have on our freeways. There is no uncongested freeway in the area. The models that are often used do not consider adequately induced demands and changing patterns and many secondary variables. We need to provide alternatives and shift incentives to reduce demand on the freeways for individual and truck mobility so our current freeways can function efficiently most of the time. We need to coordinate smart land use with transportation. There are a lot of creative thinkers and voices. Let's work together to come up with the best solutions!

Carol Teutsch, M.D.

## SAVE Coyote Hills!

Friends of Coyote Hills P.O. Box 5267, Fullerton, CA 92838 [www.coyotehills.org](http://www.coyotehills.org)

Feb. 10, 2012

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)  
Via email

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). Friends of Coyote Hills is based in Fullerton, and our mission is to permanently protect all 510 acres of West Coyote Hills, one of the last remaining natural open spaces in north Orange County, from development through acquisition, to ensure a lasting public park for recreation and enjoyment. Our organization includes support from 20,000 residents in Orange and Los Angeles Counties. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR).

We are so pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is a remarkable first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.

Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas **that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of *critical habitat* to mitigate impacts related to future transportation projects" [emphasis added].** We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands."

Because this program is directly tied to the implementation of transportation projects there is a clear connection to the County Transportation Commissions (CTCs). We do however, respectfully request that conservation-focused organizations and conservation focused state agencies, conservancies, and joint power authorities be included in the discussions regarding setting priority conservation areas. For example, Friends of Coyote Hills has specific knowledge about lands and linkages in and near West Coyote Hills. We offer our expertise to you during this process. In addition, we also believe targeted outreach efforts in each of the SCAG counties would create an open and transparent process for setting priorities. **This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (page 128 of the Draft 2012 RTP/SCS).**

### **Locations for Mitigation (pg. 78 of the Draft 2012 RTP/SCS)**

On page 78 of the Draft 2012 RTP/SCS, the document mentions the 2008 Regional Comprehensive Plan that inventoried protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park and recreation areas. We were pleased that SCAG completed this Plan showing what areas are protected and critical to maintaining functioning habitat reserves. We agree that the planning efforts SCAG undertakes in the future should

involve updating the maps, but recommend expanding the language in this section to include all forms of protected lands. By limiting the acquisition and management opportunities of conservation lands to just Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) areas, decisions about priority conservation areas will be misinformed. In fact, it no longer demonstrates a comprehensive plan because of the limited scope (of pre-established mitigation sites, which are likely unrelated to transportation projects). Protected areas (e.g., National Forests, State Parks, Regional Parks, etc.) not in an NCCP/HCP are excluded from the big picture, yet they have extensive benefits to the entire open space system and often times link important habitat areas throughout the region. Consequently, we recommend having this updated map and mitigation site locations expanded to include more than just NCCP/HCP areas and instead include all levels of protected lands (federal, state, regional, and local).

We hope you utilize the experience and expertise of already-established programs in both Orange and San Diego Counties. The language, as it exists now ("**achieved through already-established programs**") implies no other transportation agency in the region can adopt or implement an advanced mitigation program. We recommend rephrasing this sentence to be more clear about the eligibility of transportation agencies and utilizing the experience existing regional programs.

On page 79 of the Draft 2012 RTP/SCS we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions. We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of **wildlife linkages in this section**. **Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.**

Renewed Measure M in Orange County incorporated language that demonstrates a net environmental benefit in conjunction with a net benefit in the delivery of transportation improvement projects. Some of the environmental benefits include: landscape level acquisition, restoration, and management. Some of the transportation benefits include: streamlined permitting, involvement of the resource and permitting agencies, and reduced project delays. **We believe there is an opportunity to incorporate similar "net environmental benefit/net benefit of transportation projects" language in the Draft 2012 RTP/SCS. To that end, we recommend the language from the Orange County Transportation Authority's Ordinance #3 Section 2, Item A.5.iii (page B-5) as a starting place.**

We **appreciate SCAG's effort to create a** strategic planning process that would document important conservation lands in the region. We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this policy. Should you need to contact me, I can be reached at 714-870-9777.

In addition, we **request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation**, please send information to [sgregg411@roadrunner.com](mailto:sgregg411@roadrunner.com)

Sincerely,  
Friends of Coyote Hills  
Shirley Gregg, Secretary

# HILLS FOR EVERYONE

Southern California comes  
together at the Puente - Chino Hills



Los Angeles County  
Orange County  
Riverside County  
San Bernardino County

February 10, 2012

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street 12<sup>th</sup> floor  
Los Angeles, CA 90017  
RTP@scag.ca.gov

Re: Comments on the Draft RTP/SCS and Draft PEIR

Dear Ms. Lin,

Thank you for the opportunity to comment on the Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (PEIR). Hills For Everyone (HFE) is a 34 year old non-profit organization that established Chino Hills State Park and is still working to conserve the remaining natural lands in the Puente-Chino Hills Wildlife Corridor at the juncture of Los Angeles, Orange, San Bernardino and Riverside Counties. We have extensive experience in land use, land preservation, fire history and wildlife corridors and therefore offer our comments to strengthen the RTP/SCS and Draft PEIR.

### **Adaptation (pg. 31 of the Draft 2012 RTP/SCS)**

HFE agrees Southern California will be faced with extremes in precipitation and temperature, increased storm frequency, and intensity and sea-level rise. However, we feel it is critical to include the impact of fire, especially as more people and roads come to the region. Much of California is facing significant and extended fire seasons, which have tremendous impacts on both the natural environment and the developments nearby. In essence, we have planned our entire infrastructure system (e.g., flood plains, water networks, transportation methods) on the climate being a certain way and now that climate baseline is changing.

Since 1986 the number of major forest fires in California has quadrupled due to more days with summer-like and generally hotter temperatures.<sup>1</sup> This increase in fires has numerous implications, including but not limited to: increased firefighting costs, increased danger to residents near the wildland urban interface, and a transition of habitat types to more flammable vegetation due to increased fire frequency.<sup>2</sup>

<sup>1</sup> California Energy Commission. "Public Interest Energy Research Climate Change Program." Retrieved 2 Feb 2012 from the California Energy Commission website: <http://www.energy.ca.gov/2009publications/CEC-500-2009-092/CEC-500-2009-092.PDF>

<sup>2</sup> Department of Justice. "Global Warming Impacts in California." Retrieved 2 Feb 2012 from the California Attorney General's website: <http://www.ag.ca.gov/globalwarming/impact.php>

### **Recommendation #1**

We recommend that as a part of the SCS in the Adaptation section of the document, SCAG provide examples of how it and local jurisdictions plan to adapt to these new risks, especially in regard to wildland fires, through better land use choices. For example as it relates to fires, fire officials, planners, developers, transportation agencies, and others must shift the focus from primarily a reactionary fire plan (i.e., fighting fires when they occur) to a preventative fire plan (e.g., creating buffers between communities and natural lands). What other steps will SCAG be taking to adapt to climate change and to ensure public health, economic livelihoods, the financial sector, the insurance industry, individual comfort, natural lands and recreation areas will be protected?

### **Safety and Security First (pg. 37 of the Draft 2012 RTP/SCS)**

We applaud your efforts to ensure Southern California's residents are both safe and secure on the region's transportation system. We were also pleased to see one of your two main goals for safety and security is to "prevent, protect, respond to, and recover from major human-caused or natural events in order to minimize the threat and impact to lives, property, the transportation network and the regional economy" (p. 37). HFE has just completed a near 100 year analysis of fires in the four-county area surrounding Chino Hills State Park. See Attachment 1, which documents the fire frequency of the Chino Hills. What we've found is that proximity of roads to natural lands directly increases the likelihood for fires to ignite and burn both habitat and homes.

For example, as it relates to the 91 Freeway at the juncture of Riverside and Orange Counties, we have provided to you an analysis of the fire perimeters and points of origin for fires that burned in and near Chino Hills State Park. Along this freeway alone, there are 48 separate fires that ignited/burned. From 1914 – 1963 (49 years), 1963 being when the freeway opened, we have records of six fires. Since 1963 – 2012 (49 years), after the freeway opened, there were nearly seven times as many fires recorded (41). The average fire size for recorded fires was 6,263 acres. It is clear to us that the safety and security of residents along this one transportation corridor are being significantly impacted because of 91 Freeway, not to mention disruption of mobility due to road closures because of fires and evacuations.

### **Recommendation #2**

With additional roadway and other projects planned in and around the Puente-Chino Hills Wildlife Corridor on the 57, 91 and 71 Freeways, we ask that SCAG analyze potential fire prevention measures along freeways that bisect natural lands. For example, one fire prevention measure would be the creation of hardscape along the roadway edges so that dry brush cannot ignite when transportation-related fires begin. Reducing the fire frequency and duration not only protects habitat, but also allows continued and uninterrupted operation of the major transportation corridors and, importantly, protects life and property of local residents.

### **Biological Resources and Open Space (pg. 79 of the Draft 2012 RTP/SCS)**

We reiterate the importance of acknowledging the impact of wildland fire with a transportation-generated point of origin on our natural lands. Though wildlife fatalities, habitat fragmentation, and other habitat impacts are important—if the habitat can no longer regenerate in its natural and native state due to excessive fire frequency the long term preservation of the land has been lost.

### **Recommendation #3**

As previously mentioned, we recommend incorporating fire prevention strategies along natural areas bisected by major transportation corridors. For example, the 91, 57, 71 Freeways all

bisect natural lands and not only inhibit natural migration and movement of large animal species, they become areas prone to fire ignition and therefore habitat destruction.

### **Growth in the SCAG Region (2035) (Exhibits 4.1, 4.2 and 4.3)**

We appreciate that SCAG has included a projected population, employment, and housing growth maps as exhibits, but are dismayed that the maps are illegible. In order to appropriately comment on this map it must be readable.

From what we can decipher, the area of the Puente-Chino Hills Wildlife Corridor, known as the Missing Middle, is shown as adding 2000 – 3500 people per square mile. This area is designated as a Significant Ecological Area (SEA) in the Los Angeles County General Plan, thereby acknowledging its significant natural resource values. The owner, Aera Energy, has attempted to achieve entitlements on this property twice without success because of the SEA designation.

Ironically, this particular development proposal's population, employment, and housing growth areas contradict the goals of SB 375 and its requirement for reduced vehicle miles traveled (VMT) since the location of the development is nowhere near transit; does not include a major employment center but instead focuses on large single family residential units; encourages dependency on the automobile and will, when combined, increase VMTs, not reduce them.

In addition, related to Exhibit 4.2, there are no employment centers approved or proposed on the Aera Energy property in Los Angeles County. As noted in your Integrated Growth Forecast (p. 111) the "RTP/SCS depends heavily on accurate and credible forecast for future growth in population, housing and employment." It is therefore misleading to show growth when residential units are the only documented development feature. And likewise it is inaccurate to show such a large population growth in an area protected under the County's own SEA program.

### **Advanced Mitigation Policy**

While we understand the RTP is directly related to County Transportation Commissions (CTCs) we would respectfully request that conservation organizations, like HFE, and other related agencies, conservancies, and joint power authority's (e.g., the Santa Monica Mountains Conservancy, Mountains Recreation and Conservation Authority, and the Wildlife Corridor Conservation Authority) be included in determining priority conservation areas and plan development. CTCs, with all due respect, do not tend to focus on nor do they specialize in conservation of natural lands.

As the Orange County Transportation Authority will confirm, it relied upon many sources for establishing its priority conservation areas under the Environmental Mitigation Program of Renewed Measure M. To that end, HFE would like to offer its assistance with potential conservation areas in the four-county region. In addition, we believe there are similar conservation non-profit organizations and entities throughout the SCAG region that could provide useful, beneficial, and relevant information about their on-the-ground priorities.

### **Recommendation #5**

We recommend that SCAG incorporate public workshops and outreach to effectively gather information from conservation organizations and other related agencies on conservation priorities. This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (pg. 128 of the Draft 2012 RTP/SCS).

Additionally, we also believe there are conservation opportunities above and beyond the Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) areas to acquire, protect, and preserve land in perpetuity.

#### **Recommendation #6**

We recommend that SCAG expand the possible mitigation sites to include any undeveloped natural lands in its inventory as this would be a more inclusive list than just focusing on NCCP/HCP lands, which by their very nature are limited to particular areas of each county (where established) and related to specific residential developments, not transportation projects (the Orange County Transportation Authority's NCCP/HCP is the exception).

#### **Mitigation Measures: Biological and Open Space (Section 3.3 of the PEIR)**

In addition, we have comments that we hope strengthen the mitigation measures proposed in the draft PEIR.

First, as it relates to MM-BIO/OS2 (replanting disturbed areas with native vegetation), we agree avoidance should be the first approach and use of native high quality vegetation should be installed. However, in working with the Orange County Transportation Authority, we believe there is an opportunity to ensure a better functioning ecosystem pre- and post-construction activity. Specifically, the Measure M2 Ordinance states its program will establish an "accounting process for mitigation obligations and credits that will document *net environmental benefit* from regional, programmatic mitigation in exchange for *net benefit in the delivery of transportation improvements* through streamlined and timely approvals and permitting" [emphasis added].<sup>3</sup> With SCAG's potential adoption and promising opportunity for early implementation of the advanced mitigation program, inclusion of net environmental benefit language would improve program and the delivery of freeway projects at a minimum in terms of construction, timing, and budget.

#### **Recommendation #7**

Therefore, we recommend ensuring that, after the impacts and restoration, the affected natural habitat realizes a *net* environmental benefit.

Second, as it relates to MM-BIO/OS36 (assessment of habitat linkages) we agree habitat linkages should be preserved and improved, but also believe utilizing existing data when evaluating habitat linkages will aid in the evaluation process. It is critical that the integrity and functionality of the wildlife corridor(s) be preserved *before* construction begins and if alternative linkages are needed those be established and studied prior to construction commencement.

#### **Recommendation #8**

Therefore, we recommend utilizing existing data and research conducted by agencies (e.g., US Geological Survey, California Department of Parks and Recreation) and qualified biologists on assessment of habitat linkages and their function and/or risk of habitat fragmentation, encroachment, and urban edge effects. In addition, during construction the wildlife corridor should maintain its functionality and again, if the linkage is compromised the mitigation measures for alternative linkages should come *before* the construction activities begin.

Third, MM-BIO/OS38 (analysis of wildlife corridors, impacts avoided or minimized) provides a good place to start in analyzing wildlife movement corridors, but can be expanded to include

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<sup>3</sup> Orange County Local Transportation Authority. "Ordinance No. 3." 24 July 2006. Section II Item A.5.iii, page B-5.

determining locations where wildlife are crossing roadways that do not yet have established culverts, undercrossings, etc.

**Recommendation #6**

We recommend using roadkill data and surveys to determine where additional linkages and/or culverts/undercrossings are needed, but not yet installed. This pre-construction, pre-design activity can yield important information during the project planning phase so that connectivity can be improved during project implementation.

Thank you for the opportunity to provide feedback on the Draft 2012 RTP/SCS and the PEIR. We look forward to working with you in the future on the SCS and the conservation policy.

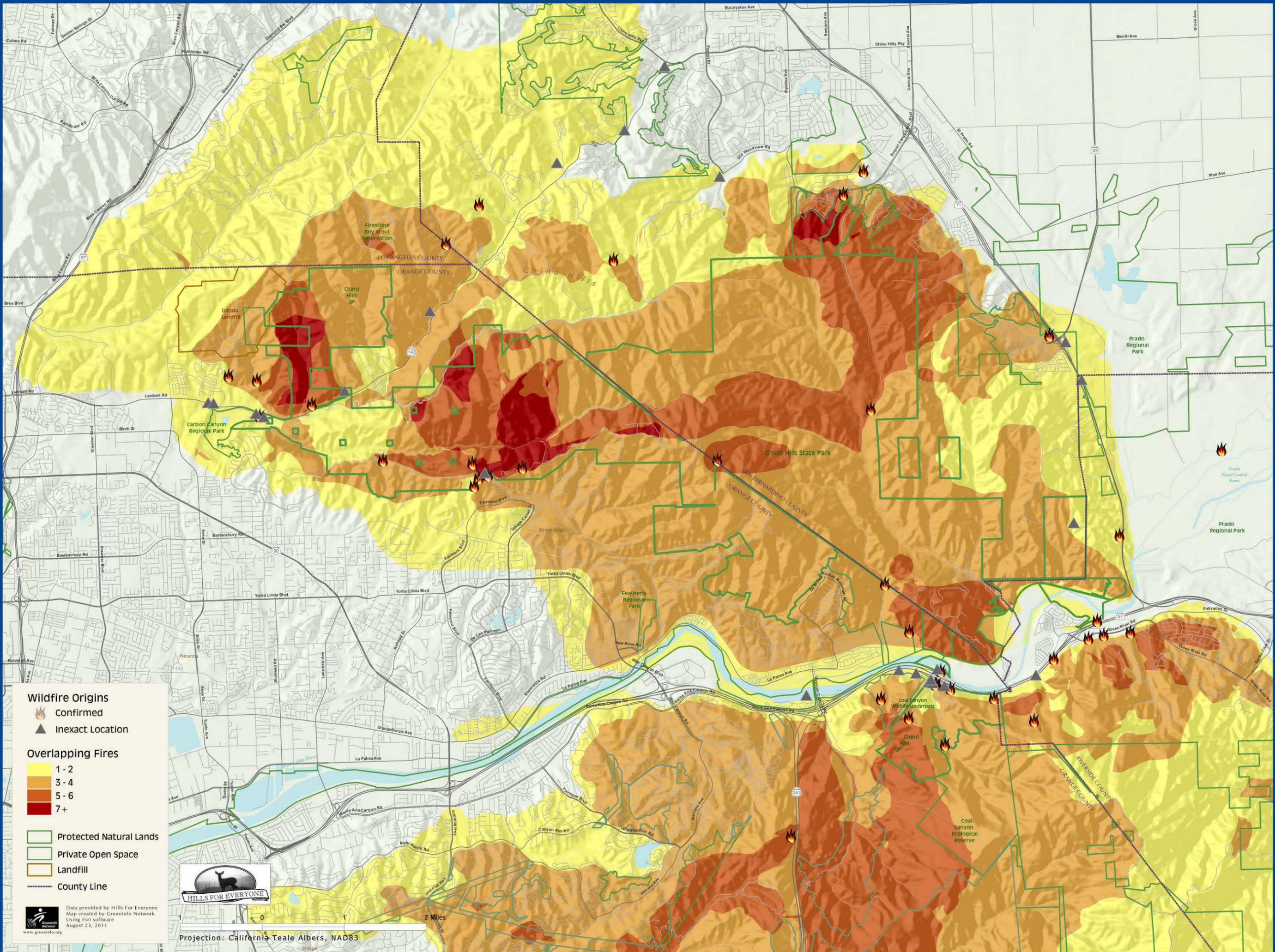
Regards,

*Claire Schlotterbeck*

Claire Schlotterbeck  
Executive Director

Attachment

# Wildfire Origins and Overlapping Fires near Chino Hills State Park





## Hills For Everyone Fire Research Project Fire Statistics for the 91 Freeway (Perimeters)

### Fire Location

Of the 37 separate fire perimeters that burned along the 91 freeway

- 13 fire burned along the freeway
- 18 fires within a ¼ mile of the freeway
- 6 fires within a ½ mile of the freeway

### Fires before/after Freeway Opened (1963)

- 6 fires burned before the freeway opened (48 years of fire data, 1914-1963)
- 29 fires burned after the freeway opened (48 years of fire data, 1963-2011)

### Adjacency to Chino Hills State Park

Of the 37 separate fires perimeters that burned along the 91 freeway

- 16 burned in Chino Hills State Park
- 2 burned adjacent to Chino Hills State Park (shared a border)
- 19 burned outside Chino Hills State Park (close enough to cause concern)

### Fire Size

Of the 37 separate fire perimeters that burned along the 91 freeway

- Largest Fire – 41,285.2 acres (Green River Fire – November 1948)
- Smallest Fire – 0.1 acres (Coal Canyon – July 2003)
- Average Fire Size – 6,263 acres

### Fire Date

Of the 37 separate fire perimeters that burned along the 91 freeway, July was the predominant month when fires burned.

MONTH	No Data	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
# of Fires			2	1	1		1	8	4	2	4	4	

### Weather Conditions

Known weather conditions for all the fires (since 1979)

WEATHER CONDITIONS	Temperature (Daytime Highest)	Temperature (Daytime Lowest)	Temperature (Daytime Average)	Wind Gusts (Highest)	Wind Gusts (Average)	Most Common Wind Direction
Stats	102°F	70°F	86°F	29 MPH	20 MPH	SW

### Corresponding Data

Of the 37 separate fires that burned along the 91 freeway

- 22 had no known point of origin
- 15 had a point of origin



## Hills For Everyone Fire Research Project Fire Statistics for the 91 Freeway (Points of Origin)

### Fire Location

Of the 18 separate fire points of origin that ignited along the 91 freeway

- 3 fire ignited at the Coal Canyon exit
- 15 fires ignited along the 91 freeway

### Fires ignited before/after Freeway Opened (1963)

- 0 fires ignited before the freeway opened (48 years of fire data, 1914-1963)
- 18 fires ignited burned after the freeway opened(48 years of fire data, 1963-2011)

### Fire ignition causes

Of the 18 separate fires points of origin that burned along the 91 freeway

- 0 were natural
- 18 were human-caused

CAUSE	Unknown	Vehicle Fire/Crash	Arson	Downed Powerlines	Caltrans Machinery	Incendiary Device	Prescribed Burn Reignited
# of Fires	8	4	2	1	1	1	1

### Corresponding Data

Of the 18 separate fires that burned along the 91 freeway

- 11 have no matching fire perimeter
- 7 have a matching fire perimeter



**Hills For Everyone Fire Research Project**  
**Fire Statistics for the 91 Freeway (Points of Origin and Perimeters)**

**Number of Fires**

There was recorded data for 37 perimeters and 18 points of origin. In some cases the data set was complete and included both a perimeter and a point of origin. In other cases, we had only one or the other (a perimeter and no point of origin, or a point of origin with no perimeter). To provide an accurate count of actual fires we only included a single record of any given fire. Therefore there are 48 separate fires that ignited/burned along the 91 freeway.

**Fires ignited before/after Freeway Opened (1963)**

Of the 48 separate fire perimeters and/or points of origin

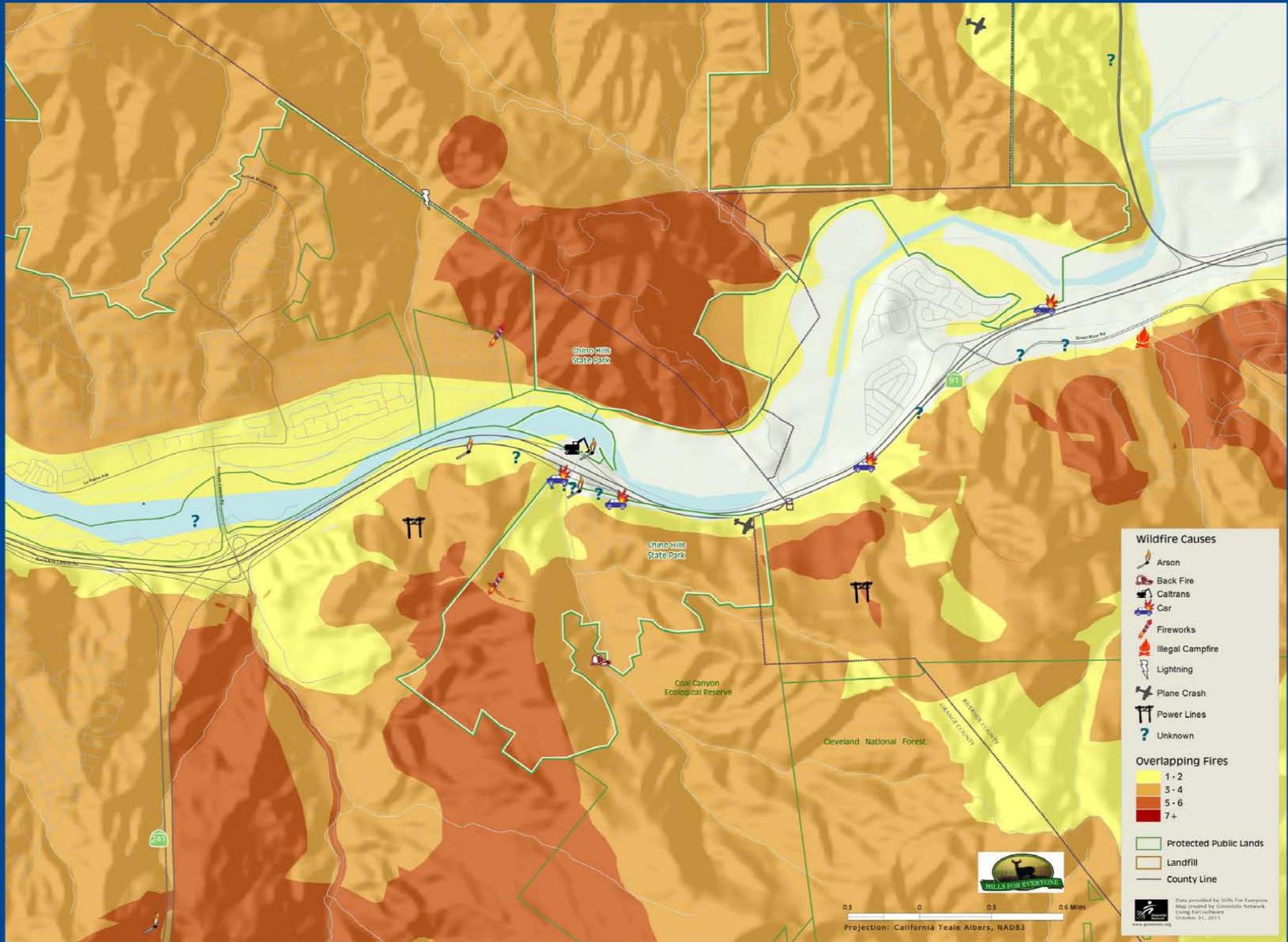
- 1 unknown date
- 6 fires ignited or burned before the freeway opened (48 years of fire data, 1914-1963)
- 41 fires ignited or burned after the freeway opened (48 years of fire data, 1963-2011)

**Fire Date**

Of the 48 separate fire perimeters and points of origin that burned along the 91 freeway, July was the predominant month when fires were ignited or burned.

MONTH	No Data	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
# of Fires	10		2	2	2	5	1	11	4	2	5	4	

# 91 Freeway - Wildfire Causes and Perimeters (1914 - 2011)



**Wildfire Causes**

- Arson
- Back Fire
- Caltrans
- Car
- Fireworks
- Illegal Campfire
- Lightning
- Plane Crash
- Power Lines
- Unknown

**Overlapping Fires**

- 1 - 2
- 3 - 4
- 5 - 6
- 7 +

**Other Features**

- Protected Public Lands
- Landfill
- County Line

Hills for Everyone  
Data provided by Hills For Everyone  
 Maps created by Geomatics Network  
 Using Esri software  
 October 31, 2011  
 www.geomatics.com

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Suite 320  
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Puente-Chino Hills Task Force  
245 Verbena Lane  
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February 13, 2012

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). The Puente-Chino Hills Task Force of the Sierra Club is based in Brea but our members come from the four counties that touch the Puente-Chino Hills. We offer hikes, sponsor educational events and provide input on projects that threaten the biological and recreational integrity of this important region. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR).

We are so pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is a remarkable first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.

Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of *critical habitat* to mitigate impacts related to future transportation projects" [emphasis added]. We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands."

On page 79 of the Draft 2012 RTP/SCS we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions.

We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of wildlife linkages in this section. Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.

We appreciate SCAG's effort to create a strategic planning process that would document important conservation lands in the region. We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this policy. Should you need to contact me, I can be reached at (714) 524-7763. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [ericsoj@mindspring.com](mailto:ericsoj@mindspring.com).

Sincerely,

Eric Johnson, Chair  
Puente-Chino Hills Task Force of the Sierra Club

# EZEQUIEL GUTIERREZ, ESQ.

[REDACTED], Adelanto, California [REDACTED] [REDACTED] [REDACTED]

February 14, 2011

President Pam O'Conner  
Board of Directors  
**SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS**  
818 w. Seventh Street, 12 Floor  
Los Angeles, CA 90017

[RTP@scag.gov](mailto:RTP@scag.gov)

Re: Draft Regional Transportation Plan / Sustainable Community Strategy 2035  
Draft Program Environmental Impact Report

Dear President O'Conner:

The comments in this letter are submitted to you on behalf of residents living in urban and suburban areas of the SCAG region for consideration by the Honorable Members of the SCAG Regional Council.

The extensive work by SCAG and its dedicated competent staff is commendable and reflects great leadership for its member jurisdictions and regional councils throughout California and the nation, as they grip with common challenges. It is for this reason as well that concerns inherent in the Draft RTP/SCS and Draft PEIR are expressed in these comments.

## **Public Participation**

The work of SCAG is challenging and must address extensive policies, programs and laws on local, state and federal levels.

One requirement that was noticeably absent throughout the Draft RTP/SCS process was compliance with the requirements of the Environmental Justice Order of the U.S. Department of Transportation (DOT). The order can be found in 62 Federal Register at 18380. The public participation required in the DOT Order is much more extensive than what was afforded in SCAG public participation efforts, as described in the Draft RTP/SCS and experienced by the undersigned. The Order required a marked elevation of public participation by communities of concern as stated "during the planning and development" of the Draft RTP/SCS rather than providing for a passive audience to occasional presentations by SCAG staff with limited time given for contemporaneous comment.

The non-compliant efforts were not without adverse consequence in providing for environmental justice; a great deal more work remains to be done, as more fully set forth in comments by *Climate Plan* and its partner coalition. It is feared that without addressing those concerns, the environmental impacts on the SCAG region will be significant and wide spread.

A draft RTP/SCS that is responsive to all residents of the region would address the needs of the entire economic spectrum of the region, not for political acceptance but as the best policy for dealing with growth, regional management and environmental impacts.

## **Environmental Impacts**

If the economy of the region is well served by this planning, and significant growth is encouraged, transportation demands by the entire economic spectrum of the region will be greatly increased. The demands on the currently overloaded transportation system of the region which we have all experienced will itself be greatly increased into an unresolvable gridlock.

Persons from communities reflecting the entire economic spectrum of the region commute daily and without adequately providing for them, as discussed by the coalition, transportation disaster in the not too distant future is certain.

Without incorporation of responsive planning, through those efforts described in the coalition comments and through full compliance with the DOT Order, the Draft RTP/SCS and its related Draft PEIR are fundamentally not certifiable.

Request is respectfully made that SCAG charge its staff with pursuing responsive planning, as recommended, so that all communities of the SCAG region and so that the region itself may benefit from these dedicated efforts.

Thanks you.

Very truly yours,

**Ezequiel Gutierrez, Jr.**  
Attorney at Law

Canyon Land Conservation Fund  
PO Box 613  
Silverado CA 92676

2-8-2012

Margaret Lin  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
[RTP@scaag.ca.gov](mailto:RTP@scaag.ca.gov)

Re: Comments on the Draft 2012 RTP/SCS and Draft PEIR

Dear Ms. Lin:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). The Canyon Land Conservation Fund is based in Silverado, Calif. and our mission is to conserve the last natural wildland in and adjacent to the Cleveland National Forest. Our organization includes support from 1, 500 residents in Orange County communities of Silverado, Modjeska and Trabuco Canyons. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR).

Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of *critical habitat* to mitigate impacts related to future transportation projects" [emphasis added]. We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands."

Thank you for reviewing our comments and we look forward to working with SCAG on the implementation of this policy. Should you need to contact me, I can be reached at 714-228-7900 #1148. In addition, we request to be included on any notifications (electronic or otherwise) about this policy's creation and implementation, please send information to [eamador@pacificexcess.com](mailto:eamador@pacificexcess.com)

Sincerely,

Ed Amador/Chay Peterson  
Canyon Land Conservation Fund  
PO Box 613  
Silverado, CA 92676

February 8, 2012

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Western Region Organizing Director  
International Brotherhood of Teamsters

**Tom Walsh**  
President  
UNITE HERE! Local 11

**EXECUTIVE DIRECTOR**

Madeline Janis, Esq.

Hasan Ikhtrata  
Southern California Association of Governments (SCAG)  
818 West 7<sup>th</sup> St, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**RE: Draft Regional Transportation Plan comment letter**

Dear Mr Ikhtrata:

Thank you for the opportunity to comment on the 2012 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We have specific concerns regarding statements and recommendations made in the document regarding how transportation improvements can increase economic competitiveness in the SCAG region.

LAANE is an advocacy organization dedicated to building a new economy for all. Combining dynamic research, innovative public policy and the organizing of broad alliances, LAANE promotes a new economic approach based on good jobs, thriving communities and a healthy environment.

We strongly believe that infrastructure investment is crucial to our region's economic recovery and to increase mobility options for workers. However, at the same time families should earn middle-class wages, with health and pension benefits, as it also essential to stimulating our economy. Solid infrastructure investment and good jobs go hand-in-hand in being able to maximize public investment.

We find it very troubling that an agency, such as SCAG, would recommend or suggest that lowering workers' wages would make the region more economically competitive, as stated in the Economic and Job Creation Analysis Appendix. Public investment that is tied to increasing worker standards; workforce training programs and targeting communities disproportionately affected by poverty and unemployment will make us more economically competitive. SCAG should look towards models already existing, for example in Los Angeles County, to guarantee efficiency in infrastructure projects and put people back to work.

**Draft Analysis Comments**

1. On page 8, the draft Economic and Job Creation analysis states:

*"The RTP can boost employment in two ways--providing jobs for persons in highway and rail construction, operation, and maintenance, and boosting the economic competitiveness of the SCAG region by making it a more attractive place to do business."*

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President  
UNITE HERE! Local 11

**EXECUTIVE DIRECTOR**

Madeline Janis, Esq.

SCAG could take this recommendation one step forward by identifying strategies which ensure the creation of good-middle class job creation and project delivery. One such tool are Project Labor Agreements (PLAs), in which public agencies can use to attract a highly-skilled workforce to complete construction projects on-time and on-budget. PLAs, used in both the public and private sector, are pre-bid, collective-bargaining agreements between a developer (or agency) and the construction trade unions to set out wages, standards and benefits for workers on a construction project. In exchange, both parties agree to refrain from strikes or lock-outs. Because they are traditionally used on large-scale, multi-year projects, they provide excellent opportunities to develop jobs programs for communities.

LAANE has pushed for a more comprehensive approach by advocating for Construction Careers Policies, which combine a PLA and a targeted hire program, which requires contractors to set aside a percentage of construction jobs to individuals who live in communities most affected by high unemployment and poverty, and with barriers to employment.

PLA are an increasingly popular project delivery tool in the SCAG region. Construction Careers policies have been approved at the following agencies:

- City of Los Angeles Community Redevelopment Agency (CRA-LA)
- City of Los Angeles Department of Public Works
- Port of Los Angeles

Recently, Construction Careers Policies have been applied to transportation-related construction projects. In March 2011, the Exposition Line Construction Authority passed such a policy for Phase II of the light rail project. In January 2012, the Los Angeles County Metropolitan Transportation Authority (Metro) Board of Directors unanimously approved an agency-wide policy that includes a PLA and targeted hire program for projects greater than \$2.5 million, which includes many projects funded by Measure R. Metro is the first transit agency in the country to approve such a policy. This approach can serve as a valuable tool for transit agencies throughout the SCAG region that are dealing with the twin problems of congestion and unemployment. In February 2011, the Federal Transit Administration (FTA) approved the use of targeted hire on projects receiving federal dollars. The FTA approval sets a national precedent for targeting disadvantaged workers on transit projects.

2. "How Transportation Improves Economic Competitiveness" Section (P. 8)

This section of the draft analysis "outlines five paths through which transportation improvements can increase regional economic competitiveness." We find it troubling that SCAG suggests that, under number 3, "Reduced Congestion Reduces Employees' Asking (or Reservation) Wage." It states, "Metropolitan areas, all else equal, lure more migrants into the region due the amenity value of lower traffic congestion. This increases the supply of available labor, *driving wages down.*"

These statements suggest that congestion reduction alone would encourage people to move into the SCAG region, as opposed to other more essential factors such as major industries that are rooted in the local economy---goods movement, tourism,



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Organizing Director  
SCOPE

**Danny Tabor**  
Mayor (Ret.)  
City of Inglewood

**Manny Valenzuela**  
Western Region Organizing Director  
International Brotherhood of Teamsters

**Tom Walsh**  
President  
UNITE HERE! Local 11

**EXECUTIVE DIRECTOR**

Madeline Janis, Esq.

construction, entertainment, etc. We should be looking to strengthen industries that are vital to our economy, not creating low-road career options for residents.

It is also highly problematic to have as a policy objective to *lower wages* when the SCAG region has high levels of poverty, unemployment, sluggish growth, and high levels of income inequality. SCAG has provided an analysis that essentially implies that lowering wages are a benefit to the region, and that the agency can help achieve that through the 2012 RTP congestion reduction interventions, projects and policies.

For example, the SCAG Region:<sup>1</sup>

- Ranked last in average wage per job at about \$44,379 among the nine largest metropolitan areas
- Has the highest poverty rate among the nine largest metropolitan regions in the nation
- In 2006, had the highest housing cost burden among the nine largest metropolitan regions in the nation, with 53 percent of owner households paying 30 percent or more of their incomes on housing

The seven counties that are part of the SCAG region are grappling with significant challenges that have been further exacerbated by the recession. When workers spend less on transportation costs, a benefit of reduced congestion, they are able to spend their earnings in other ways, stimulating the regional economy. Given that housing prices in the SCAG region, especially in Los Angeles County, are very high, congestion reduction alone will not address affordability and supply, and how current income earnings play a role in where workers choose to live.

We suggest the following recommendations be considered in revising the RTP:

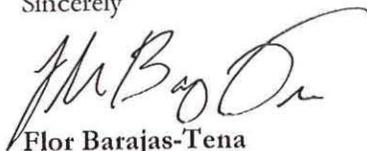
- Delete language in the 2012 RTP/SCS or appendices that suggest that lower wage rates in the SCAG region are a benefit of the congestion reduction strategies included in the plan;
- Include tools, such as project labor agreements with targeted hire, that allow government agencies to ensure that investment in transportation infrastructure also creates middle-class careers, especially in construction;
- Include an analysis on what the economic benefits of congestion reduction in improving the quality of life of workers in the SCAG region, which includes how the diversion of earnings from transportation costs to other vital services and industries can help stimulate our economy.

We hope that the agency takes these recommendations seriously and develops a blueprint for the region that improves the quality of life of working families through effective infrastructure investment and the creation of good middle-class career opportunities. If you have any questions or would like to discuss please feel free to call us at 213-977-9400.

<sup>1</sup> Southern California Association of Governments (SCAG). State of the Region 2007. [http://scag.ca.gov/publications/pdf/2007/SOTR07/SOTR07\\_FullReport\\_lores.pdf](http://scag.ca.gov/publications/pdf/2007/SOTR07/SOTR07_FullReport_lores.pdf)



Sincerely



Flor Barajas-Tena

Deputy Director

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**Manny Valenzuela**  
Western Region Organizing Director  
International Brotherhood of Teamsters

**Tom Walsh**  
President  
UNITE HERE! Local 11

**EXECUTIVE DIRECTOR**

Madeline Janis, Esq.



## City of Brea

February 13, 2012

*sent via email: RTP@scag.ca.gov*

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

**SUBJECT: COMMENTS ON THE DRAFT 2012 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRATEGY (2012 RTP/SCS)**

Dear Margaret:

I am writing this letter to provide you with the City of Brea's comments on the 2012 RTP/SCS. We view the proposed RTP/SCS of critical importance to Brea and the region and we congratulate SCAG staff on its preparation which is truly a monumental achievement!

Brea values the dialog we have historically enjoyed with SCAG on regional issues. We have a solid track record and commitment to providing land use and transportation policies which are consistent with the existing and planned regional transportation system. We appreciate that the draft RTP/SCS encompasses three principals: Mobility, Economy, and Sustainability, that collectively work to significantly improve existing transportation and air quality challenges for the region. The inclusion of active transportation goals and funding at the regional level is one which Brea is extremely interested in for our "Tracks at Brea" trail program to increase non-motorized transportation in our community. The plan also identifies the future bus rapid transit connection planned near the Brea Mall that will connect Brea to additional alternative transportation modes. We further note that our General Plan has numerous land use and transportation goals and policies already in place that align us well with the proposed 2012 Regional Transportation Plan and Sustainable Community Strategy.

We appreciate this opportunity to comment on the draft RTP/SCS. Our comments are primarily at the policy/implementation level although we have included one technical comment on the use of the revised OCP 2010 data set (which are also included within our comment letter to SCAG regarding the Program EIR). Our comments for the draft RTP/SCS are provided below:

**City Council**    **Don Schweitzer**    **Brett Murdock**    **Ron Garcia**    **Roy Moore**    **Marty Simonoff**  
*Mayor*                      *Mayor Pro Tem*                      *Council Member*                      *Council Member*                      *Council Member*

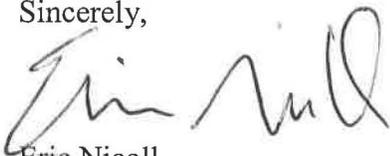
1. At what project threshold and how will SCAG review the performance of Brea and other local jurisdictions for consistency with the 2012 RTP/SCS through the life of the plan?
2. Can you explain further how SCAG envisions directing new housing and employment growth to High Quality Transit Areas (HQTA) in Brea and Orange County? Are there any consequences if agencies find it inappropriate to put growth in these areas, but are achieving the Plan's goals in other areas of our City?
3. Public Health is a concern of our residents. Does SCAG see a conflict in placing a majority of our future housing growth for Brea adjacent to high traffic roadways (57 Freeway) and the potential for public health impacts (e.g. air quality) associated with such areas?
4. The City supports the RTP/SCS goals for including valuable open space land preservation within its mitigation strategies as discussed in the Transportation Investments chapter (page 78) of the plan. This approach is consistent with the value placed on open space within the City's General Plan and is a key component of a balanced land use approach for the region. Lands within and surrounding Brea have the potential to provide for such mitigation approaches thus assisting with GHG reductions for the region. We welcome discussion with SCAG on this implementation as specific projects are submitted in the future.
5. The Plan includes a significant portion of "New Revenue Sources and Innovative Financing Strategies" that are not currently in place or available. While some of the proposed revenues are within the control of SCAG or MPOs and County Transportation Commissions, the majority of the revenues (in terms of dollars) require either state or federal action to implement. What might the implications be if these new revenue sources and innovative financing strategies do not become available, for both SB 375/SCS compliance and/or air quality conformity?
6. Several goals of the plan are implemented through mitigation measures that indicate Brea or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus are speculative. They also represent prescriptive means to accomplish the mitigation. It is requested that such measures be reworded to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. Also, please clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.
7. On page 149, it is stated that "The following tables list specific implementation strategies that local governments, SCAG and other stakeholders **can and should** undertake in order to successfully implement the SCS." Please indicate whether SCAG has conducted any feasibility analyses to determine if all of these strategies are feasible and what the implications are if not all are implemented. Also, please describe what Brea's obligations are anticipated to be as a result of adopting these strategies as a list to be accomplished

rather than a menu of options. It is requested that the language in the sentence be clear that it is permissive and at a minimum, change the text “can and should” to “may.”

8. We request that internal consistency of the Land Use Pattern map for Orange County be confirmed between the plan document (page 145) and the technical reports or appendices. Specifically, the Land Use Pattern Map for Orange County (Exhibit 4.17 enclosed) shows a significant urban village designated for northeastern Brea. This area appears to be the location of the Olinda Landfill. Future residential development in this area cannot occur due to its current use. We believe this is simply an oversight as we have provided this input to SCAG in 2009 for the CLUS project. We note that the SCS Background Documentation Appendix does include an accurate map (enclosed) for Orange County which should be revised in the final document for Regional Council review and approval.
9. We request that the adoption of the final growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level consistent with past RTPs and that these numbers be reflected in the 2012 RTP/SCS. The use of smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell could limit flexibility and a jurisdiction’s local control over land use decisions. The final growth forecast numbers are a dataset which includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG’s updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 by CDR and its use would provide consistency with the MOU on sub regional delegation between OCTA, OCCOG, and SCAG. All documents, tables, maps, narratives, modeling runs, PEIR alternatives (including Alternate C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.
10. We suggest that the final document should reference the chapter number of each section of the plan in the header to assist the reader in cross-referencing the document.
11. We suggest adding to the glossary a definition for Active Transportation.

The City of Brea appreciates the opportunity to provide these comments. We recognize that plan goals can be successfully achieved through many different routes determined by local control and we are ready to work together with SCAG to implement them in Brea. Additionally, we have submitted a separate comment letter on the Draft Program EIR to Mr. Jacob Lieb. Please feel free to reach me at (714) 671-4421 or David Crabtree, Deputy Director/City Planner at (714) 990-7674 if you should have any questions about the comments.

Sincerely,



Eric Nicoll  
Community Development Director

cc: Honorable Mayor and City Council  
Brett Murdock, Member, SCAG Regional Council  
Tim O'Donnell, City Manager  
Charlie View, Public Works Director  
David Crabtree, Deputy Director/City Planner  
Adrienne Gladson, Senior Planner  
Dave Simpson, Executive Director, Orange County Council of Governments (OCCOG)

Enclosures

EXHIBIT 4.17 Land Use Pattern Orange County (2035)



INCORRECT

EXHIBIT 34 Land Use Pattern Map - Orange County 2008

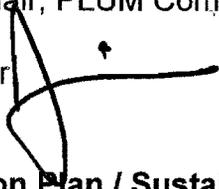


CORRECT

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

Date: January 30, 2012

To: The Honorable City Council, City of Los Angeles  
c/o City Clerk, Room 395  
Attention: Honorable Bill Rosendahl, Chair, Transportation Committee  
Attention: Honorable Ed Reyes, Chair, PLUM Committee

From: Jaime de la Vega, General Manager  
Department of Transportation 

Subject: **Draft 2012 Regional Transportation Plan / Sustainable Communities Strategy (CF 11-1223)**

This report provides additional comments regarding the draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), being prepared by the Southern California Association of Governments (SCAG). These comments supplement those comments approved by Council and the Mayor as indicated in the attached Council action of October 5, 2011.

### Recommendations

- 1) Approve the comments provided in this report as City of Los Angeles comments to SCAG on the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Following the submittal of these comments to SCAG, the Department of Transportation will continue to collaborate with SCAG in an effort to have the City's comments substantially incorporated into the RTP/SCS and related Program Environmental Impact Report (PEIR).
- 2) Authorize the Department of Transportation to transmit comments to SCAG that are substantially consistent with those contained in this report, including the attached comments from other departments.

### Summary

Every four years the Southern California Association of Governments (SCAG) prepares a Regional Transportation Plan (RTP) for the six-county region. The 2012 RTP/SCS includes planned transportation projects and demographic assumptions through the year 2035. The plan presents a strategy for the investment of \$524.7 billion in the region's transportation system between 2012 and 2035 and, for the first time, a Sustainable Communities Strategy (SCS) for the six-county region.

The SCS, required by SB 375, focuses on reducing greenhouse gas emissions (GHGe)

from cars and light trucks by means of several strategies, including integration of land use and transportation planning, transit system expansion, and transportation demand management (TDM). The California Air Resources Board (CARB) established regional GHGe reduction goals of eight percent per capita by 2020 and thirteen percent per capita by 2035, compared with 2005 levels. SCAG's analysis indicates that the draft RTP/SCS would achieve the 2020 target, and would exceed the 2035 target with a GHGe reduction of sixteen percent.

According to SCAG's analysis and modeling, the draft RTP/SCS also meets the federal conformity requirements for air quality. It is important to note that reducing GHGe is not required for achieving air quality conformity. Therefore, although many of the strategies that achieve air quality conformity also assist with GHGe reductions, the two analyses are generally independent of each other.

A Regional Transportation Plan (RTP) also requires that there be reasonably available funding sources. The RTP proposes expenditures of \$524.7 billion, and SCAG states that without new revenue sources the RTP faces a funding shortfall of approximately \$219.5 billion. Various means to make up the shortfall are set forth. The RTP suggests that \$127.5 billion of the shortfall could be addressed by action at the State or Federal level to increase the gas tax \$0.15 per gallon between 2017 and 2024. The RTP states the State and Federal government could then replace the gas tax with an indexed mileage-user fee of \$0.05 per mile beginning in 2025. If the mileage-based fee was not implemented, then there would be a need to further increase the gas tax to generate the revenues that would have been created by the mileage-based user fee. Although these proposals depend primarily on State and/or Federal action, they deserve further discussion within the City as the implementation year of 2017 approaches.

SCAG is to be commended for a multi-year effort to develop the 2012 RTP/SCS, including an unprecedented outreach effort. In particular, the passage of SB 375 required an extensive public education campaign including outreach to cities, environmental, public health and business groups. SCAG conducted a series of periodic workshops across the region, which included preparation of in-depth graphic and narrative presentation materials. The City appreciates the outstanding outreach effort, both to the City itself and across the region.

Pursuant to the Council action of October 5, 2011, and in accordance with past practice, LADOT has reviewed the draft 2012 RTP/SCS and compiled proposed comments to SCAG. In addition, LADOT has coordinated the preparation of these comments on the RTP/SCS with other City departments that are most impacted by the RTP. LADOT very much appreciates the cooperation of the departments of Los Angeles World Airports (LAWA) and City Planning each of which have provided comments. The Port of LA has indicated that it does not have formal comments at this time. In addition, the Metro staff report on the RTP/SCS is also attached for reference.

Report to City Council, dated September 21, 2011

On October 5, 2011, the City Council adopted a joint report by the Departments of City Planning and Transportation entitled "Alternatives Proposed by SCAG for the 2012 Regional Transportation Plan / Sustainable Communities Strategy" (CF 11-1223). This report, dated September 21, 2011, provided comments on four draft scenarios for the RTP/SCS, released by SCAG in July 2011. Specifically, Attachment A of the report identified proposed RTP/SCS strategies that City staff believed would, if adopted, have a potential impact on the City. For purposes of the report, "impact" was defined as a significant change from adopted City policy. Staff believes that the report, dated September 21, 2011, continues to reflect City policy with regard to many of the strategies presently included in the draft RTP/SCS.

One of the objectives of the report was for the City's comments to be incorporated into the RTP/SCS. We are pleased to report that to a large extent the City's comments appear to have been acknowledged by SCAG and therefore the RTP/SCS does not include several of the specific proposals of concern. Specifically, three of the concerns raised, and the status of the strategy in the draft RTP/SCS, are as follows:

- 1) Phased implementation of 5% of major arterials to have dedicated bus lanes. As requested by the City, the RTP does not include a specific percentage for implementation. As explained in the September 21<sup>st</sup> report, the City supports careful and selected implementation of bus lanes, but does not want to commit to implementing a specific percentage of bus lanes on City arterials.
- 2) 10% of primary and secondary arterials to include bike facilities. As requested by the City, the RTP does not include a specific percentage for implementation. As explained in the September 21<sup>st</sup> report, the City supports careful and selected implementation of bike lanes, but does not want to commit to implementing a specific percentage of bike lanes on City arterials. Rather, the City supports the specific implementation of its adopted Bicycle Plan.
- 3) Cordon pricing around key activity centers – initial pilot projects in downtown Los Angeles and potentially LAX complex. As requested by the City, this project has been included in the Strategic Plan portion of the RTP/SCS, which acknowledges that the project still requires further study and has not been officially approved by the City.

**Discussion of Policy Concerns and Comments**

Although most of the concerns raised in the September 21, 2011 report appear to have been addressed, LADOT has identified additional areas of concern with regard to the draft 2012 RTP/SCS, which was released for public comment on December 20, 2011.

LADOT has comments and concerns in the following areas:

Project List for RTP/SCS

The RTP includes an extensive project list. As stated in the Project List appendix, the list is divided into three sections, as follows: 1) The Federal Transportation Improvement Program (FTIP), which forms the foundation of the RTP project investment strategy and represents the first six years of already committed funding; 2) the Financially Constrained list of projects not included in the FTIP but which have "reasonably available" funding; and 3) the Strategic Plan representing an unconstrained list of potential projects that the region would pursue given additional funding and commitment.

As with past RTP cycles, LADOT has reviewed all three project lists. The FTIP and Constrained project lists appear to include, with one exception, all City of Los Angeles projects with either committed or reasonably available funding. These lists are developed through ongoing coordination between City, Metro and SCAG staff. The one project that should be added to the FTIP list is a Transit Bureau project as follows:

TIP ID LAF5427 – DASH Clean Fuel - Five Higher Capacity Vehicles (Purchase five 35-foot CNG clean-fuel buses to replace five 30-foot propane vehicles). SCAG is aware that this project needs to be added to the FTIP project list, and it is pending to be added to the list.

Regarding the Strategic Plan list, in an effort to expedite many as yet unfunded City projects, LADOT has prepared the attached list of approximately ninety projects that the City is requesting to be added to the Strategic Plan.

Additionally, LADOT wishes to draw attention to both the Los Angeles Bicycle Plan and Mobility Hubs initiatives (a First Mile/Last Mile strategy). These efforts support both the Active Transportation and Transportation Demand Management strategies of the RTP. The RTP includes numerous references to expanded bicycle facilities and other First Mile/Last Mile strategies, and therefore these strategies are presumably included with likely funding in the Financially Constrained plan. However, to the extent these initiatives are not included in the Constrained plan they should be added to the Strategic Plan.

Importantly, Metro staff has also reviewed the RTP and found that it includes all the projects and programs in the Metro 2009 Long Range Transportation Plan (LRTP). A copy of the Metro staff report, dated January 18, 2012, is attached for reference. The RTP does not model the 30/10 (Fast Forward) proposal for Measure R projects, because the proposal has not yet been approved by the Metro Board, and still requires federal approvals. However, SCAG is supportive of the 30/10 proposal and will likely amend the RTP if the proposal secures additional approvals.

The Metro report also highlights key projects, within Los Angeles County, included in the RTP which are not included in Metro's 2009 LRTP. These key projects include:

- East-West Freight Corridor will be studied along a five mile band generally following the SR-60 corridor between the I-710 and the I-15.
- Phase I of the California High Speed Rail Authority (CHSRA) is in the draft 2012 RTP in the Constrained Plan, pending an agreement between the CHSRA and Metrolink to identify funds to bring local systems up to higher speeds (110+ mph) where possible.
- A regional Express/HOT Lane Network that expands Metro's Fast Lanes pilot project to include the I-405 and SR-91. This goes beyond the federally funded pilot studies on the I-10 and I-110 freeways.

As an overall comment, the City wishes to emphasize that, for future RTP/SCS project lists, the City, Metro and SCAG need to continue the effort to improve connectivity between various transit systems. For example, in South Los Angeles County, there needs to be greater emphasis placed on the development of feeder systems to connect and support the Blue, Green, Expo and Crenshaw lines. These systems would include, but not be limited to, expanded Bus Rapid Transit and improved bicycle and pedestrian linkages.

Recommendation:

As described above, the City should request that SCAG include the attached list of projects to the Strategic Plan. Additionally, to the extent the Los Angeles Bicycle Plan and Mobility Hubs are not included in the Constrained Plan, they should be added to the Strategic Plan.

#### Land Use Strategy and Sustainable Communities Strategy Map for 2035

As stated in the SCS Background Documentation appendix, page 110, one of the goals of the SCS is "to identify strategies that can reduce per capita vehicles miles traveled (VMT) over the next twenty-five years." Among other strategies such as Transportation Demand Management, Transit etc., one of the key strategies for reducing VMT is the land use strategy. Essentially, this strategy involves reducing VMT through the gradual implementation of smart growth policies, including Transit Oriented Development, whereby new development is focused near transit stations and high quality transit corridors. The City is supportive of smart growth policies and has been working for many years to advance smart growth planning in a variety of ways.

LADOT realizes that the Department of City Planning has a major role in the review of the land use strategy of the SCS. However, because the land use strategy involves

residential density increases near transit stops and transit corridors, the strategy, if implemented, will impact the City's transportation infrastructure needs by 2035. Accordingly, LADOT has reviewed the SCS land use strategy.

The 2012 SCS includes Land Use Pattern Maps for each SCAG subregion, based upon five Community Types (Urban, City, Town, Suburban and Rural). The maps show the development pattern, according to SCAG, that is "likely to occur" by 2020 and 2035. However, the maps utilizing Community Types are at a "macro" level. The five Community Types actually include thirteen Development Types which give a more detailed picture of the land use pattern that the SCS proposes.

Because LADOT wished to examine more closely SCAG's desired and projected land use pattern for the City, LADOT requested that SCAG provide a map of the City for 2035 in which development patterns are shown by the thirteen Development Types. Accordingly, SCAG provided a map entitled "City of Los Angeles Year 2035 Preferred Scenario by Development Type," dated November 7, 2011 (SCS map for 2035). The SCS map for 2035 represents what SCAG desires and believes is "likely to occur" by 2035, categorized by SCAG's thirteen Development Types. It therefore represents a developed, rather than merely a planned, environment.

LADOT has compared the SCS map for 2035 with many of the maps for the City's adopted 35 community plans, which are found on the Department of City Planning website. It is evident that the SCS Map for 2035 is not consistent with many of the Community Plan maps, and shows a level of residential density considerably higher than shown on the adopted Community Plan maps. In particular, the SCS Map appears to show much fewer single family neighborhoods, defined as approximately seven units per acre. Because the SCS map for 2035 shows residential densities that are different than shown in the adopted Community Plan maps, if implemented, the map would impact land use patterns and the need for transportation infrastructure.

It is true that the SCS states, and SB 375 provides, that the SCS does not supersede local land use policies (see page 158 of the RTP/SCS main document). Therefore, revising the City's land use policies to be generally consistent with the SCS map would be voluntary. However, although voluntary, the concern is that, unless the City indicates otherwise, the adoption of the RTP/SCS by the SCAG Regional Council may imply to SCAG and other parties that the City supports the implementation of the land use pattern described in the map. Moreover, the SCS states in Table 4.3 (page 150) that local jurisdictions should "Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the RTP/SCS Plan Alternative."

#### Recommendation:

The City should clarify that it is the City that determines its own land use policy, and the adoption of the RTP/SCS, including the land use strategy and maps, does not imply

that the City will implement the development pattern described in the land use strategy.

The City should indicate to SCAG that the SCS Map for 2035 appears to be inconsistent with many adopted Community Plan maps. Further, changes to adopted land use policies and plans must go through an established City process, subject to Mayor and Council approval. This process includes an extensive and robust community outreach effort. The SCS Map for 2035 represents SCAG's "vision" of the City's developed land use pattern for 2035. However, the City may or may not implement the land use pattern described on the SCS Map for 2035.

### CEQA Streamlining

The adopted September 21, 2011 City report, prepared by the Planning and Transportation departments, included the following comments:

"The Sustainable Communities Strategy will include land use maps which will facilitate CEQA streamlining of development projects. According to SCAG staff, the CEQA relief provided by SB 375 is substantial. Therefore, the City should carefully review the draft SCS land use maps to ensure the maps are consistent with adopted City land use plans.

SB 375 allows for CEQA streamlining provided a proposed project qualifies as follows:

- 1) The project must be consistent with the land use designation contained in the land use maps included in the Sustainable Communities Strategy. The maps will describe land use densities and types according to SCAG's Land Development Categories (LDC's).
- 2) The project qualifies as a Transit Priority Project (TPP), as defined by SB 375. To qualify as a TPP, a project must meet certain minimum density requirements and must be located within ½ mile of either a "major transit stop or high-quality transit corridor" (SB 375 - Section 21155). According to SCAG staff, most of the City qualifies as a TPP area because of existing transit stations and corridors.

CEQA streamlining, according to information provided by SCAG, will allow many projects meeting the above two criteria to receive the equivalent of a "mitigated negative declaration" in the development review process. This could impact development review by several departments, including Planning and Transportation.

The City requests that SCAG provide copies of the draft SCS land use maps for review by the Planning and Transportation departments, and the Council and Mayor, prior to SCS adoption."

The above comments provide an overview of CEQA streamlining. A more complete description is provided on pages 84 and 85 of the SCS Background Documentation appendix for the draft 2012 RTP/SCS. This section begins by stating: "SB 375 amends CEQA (the California Environmental Quality Act) to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for CEQA exemption for certain projects, as well as reduced CEQA analysis."

LADOT is concerned regarding the impact of CEQA streamlining if it is based, in part, on the SCS Map of 2035. As described in the Land Use Strategy and SCS Map section above, it appears that the SCS Map is not consistent with many of the land use maps of the adopted Community Plans. Accordingly, the concern is that CEQA streamlining could allow development to occur that is not consistent with adopted City plans, with related impacts on transportation infrastructure.

Recommendation:

LADOT staff has consulted with staff of DCP and the City Attorney regarding the impact of CEQA streamlining on the City's development review process. Input received from these sources indicates that although CEQA streamlining of various types will probably occur following adoption of the RTP/SCS, the City may retain some degree of "discretionary approval" authority over development projects that are subject to CEQA streamlining. Although this interpretation may be correct, LADOT believes that this area deserves further study. This is a complex and important subject, and the City should carefully evaluate and prepare for the impact of CEQA streamlining following adoption of the RTP/SCS. To the extent possible, the City's authority over its land use should be preserved.

Program Environmental Impact Report (PEIR) for 2012 RTP/SCS

The draft PEIR evaluates the potential environmental impacts associated with the adoption of the 2012-2035 RTP/SCS by SCAG. As stated in the PEIR, "The PEIR for the 2012-2035 RTP/SCS serves as an informational document to inform decision-makers and the public of the potential environmental consequences of approving the proposed Plan. The PEIR includes mitigation measures designed to help avoid or minimize significant environmental impacts." The PEIR is a program level document, generally followed by project-specific CEQA reviews which focus on project-specific impacts and mitigation measures.

The PEIR is over six hundred pages in length, and includes an Executive Summary (of 87 pages). The Executive Summary lists and describes mitigation measures in many areas, including, but not limited to: Air Quality, Biological Resources and Open Space, Greenhouse Gas Emissions, Land Use and Agricultural Resources, Public Services and Utilities, Transportation, Traffic and Security, and Water Resources. There are

over 500 mitigation measures listed, including 85 Land Use mitigation measures.

Concerns have been raised among various SCAG subregions regarding the extent and legal impact of the mitigation measures included in the PEIR. The mitigation measures extend to and impact a broad spectrum of technical and policy areas. A specific concern is with the use of the wording "can and should" throughout the PEIR. Two examples are as follows:

- "Transportation, Traffic and Security 35: Local jurisdictions can and should (emphasis added) adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation."
- "Transportation, Traffic and Security 37: Local jurisdictions and transit agencies can and should (emphasis added) provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers."

While these measures may have merit, the concern is to what extent does the "can and should" language imply feasibility and create an expectation or requirement for these measures, as well as other mitigation measures in the draft PEIR, to be implemented by the City. In addition to the local control concern, some of the measures may actually not be financially feasible for the City.

#### Recommendation:

Throughout the SCAG region, the PEIR is still being studied. The City should continue to review the PEIR as well as gather input from staff of other SCAG subregions. It is recommended that the PEIR be revised to indicate that not all of the mitigation measures will apply to each city in the region (including the City of Los Angeles). Rather the mitigation measures should represent a kind of "menu" of measures for consideration by each SCAG member agency. It is also recommended that SCAG remove the "can and" from the "can and should" language in the mitigation measures as well as the SCS Chapter of the draft RTP/SCS.

#### Comments from Other City Departments

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

- LAWA emphasizes that its first priority is to "maintain safe and efficient airports." Like most airports, LAWA receives grant funds from the FAA for eligible construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property.
- The RTP includes a proposal to promote a regional system of airport express buses, modeled in part on the FlyAway service currently operating at LAX.

Although express buses are a “promising solution” to certain ground access problems, LAWA advises that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service. LAWA cautions that its experience and studies have shown that the expansion of the express bus system at LAX will be challenging. Moreover, the expansion of express bus service, by itself, may not be effective in increasing passenger demand at “secondary” airports.

- LAWA agrees that “the aviation constraints in the region, and potential dispersion of that activity at other airports, should be re-examined in subsequent regional plans.”
- LAWA requests that, if possible, SCAG utilize the 2011 Air Passenger Survey, most likely to be released in February, to update various data points in the Aviation and Airport Ground Access appendix.

#### Department of City Planning (DCP):

The Department of City Planning has provided important comments which are highly technical and lengthy, hence they are attached to this report as Attachment D.

### **Conclusion**

The draft 2012 RTP/SCS and PEIR, released by SCAG on December 20, 2011, represent an outstanding effort to meet both State and Federal planning requirements, as well as provide for the multifaceted needs of the region. However, as described in this report, City staff has identified several areas of concern related to potential impacts on land use and transportation planning in Los Angeles. City staff has provided recommended comments to SCAG for City Council and Mayor review regarding these proposals.

### **Fiscal Impact**

This report contains comments regarding proposed policies and projects included in the draft 2012 RTP/SCS and related PEIR. The comments to be transmitted to SCAG will not impact the City's General Fund.

### **Attachments**

- A) Council Approval, dated October 5, 2011, of report entitled “Alternatives Proposed by SCAG for the 2012 Regional Transportation Plan /

Sustainable Communities Strategy (CF 11-1223)," dated September 21, 2011.

- B) Metro staff report, dated January 18, 2012, regarding the draft RTP/SCS
  - C) Los Angeles World Airports comments, dated January 20, 2012, regarding the draft RTP/SCS
  - D) Department of City Planning comments, dated January 30, 2012.
  - E) City of Los Angeles Projects Requested for Addition to the Strategic Plan
- c: Mayor Antonio Villaraigosa  
Attn: Borja Leon and Matthew Karatz  
Gerry Miller, Chief Legislative Analyst  
City Planning Department  
Los Angeles World Airports  
Port of Los Angeles

CITY OF LOS ANGELES  
CALIFORNIA



JUNE LAGMAY  
City Clerk

HOLLY L. WOLCOTT  
Executive Officer

Office of the  
CITY CLERK

Council and Public Services  
Room 395, City Hall  
Los Angeles, CA 90012  
General Information - (213) 978-1133  
Fax: (213) 978-1040

When making inquiries relative to  
this matter, please refer to the  
Council File No.

ANTONIO R. VILLARAIGOSA  
MAYOR

[www.cityclerk.lacity.org](http://www.cityclerk.lacity.org)

October 7, 2011

To All Interested Parties:

The City Council adopted the action(s), as attached, under Council File No. 11-1223, at  
its meeting held October 5, 2011.

City Clerk  
srb

#23

File No. 11-1223

TO THE COUNCIL OF THE  
CITY OF LOS ANGELES

Your **PLANNING AND LAND USE MANAGEMENT COMMITTEE**  
**and**  
**TRANSPORTATION COMMITTEE**

report as follows:

PLANNING AND LAND USE MANAGEMENT and TRANSPORTATION COMMITTEES' REPORT relative to Southern California Association of Governments (SCAG) proposed alternatives for the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Recommendations for Council action:

1. AUTHORIZE the Los Angeles Department of Transportation (LADOT) and City Planning Department (Planning) to:
  - a. Submit to SCAG the comments contained in Attachment A of the joint LADOT and Planning report dated September 21, 2011 (contained in the Council file), inasmuch as the strategies identified therein may have a potential impact on the City.
  - b. Convey the comments to SCAG requesting that they be incorporated into the 2012 RTP/SCS with the understanding that the comments may be modified and supplemented by the City, with Council and Mayor approval, as the RTP/SCS is further developed.
2. REQUEST SCAG to provide copies of the draft SCS land use maps for review by the LADOT and Planning, Council, and Mayor prior to SCS adoption, inasmuch as the maps will identify geographical areas of the City where projects can be eligible for California Environmental Quality Act streamlining and thereby potentially allow development projects to receive mitigated negative declarations in the development review process and thereby impact growth in the City.

Fiscal Impact Statement: The LADOT and Planning Departments report the potential fiscal impact to the City has not been determined. Further review and evaluation is necessary as more information on the ultimate preferred alternative is presented by SCAG.

Community Impact Statement: None submitted.

#### SUMMARY

At a joint meeting held on September 27, 2011, the Planning and Land Use Management and Transportation Committees considered a joint LADOT and Planning Departments report relative to Southern California Association of Governments proposed alternatives for the 2012 Regional Transportation Plan/Sustainable Communities Strategy. Representatives from the LADOT and Planning gave the Committees background information on the matter. The Committees requested SCAG to provide copies of the draft SCS land use maps for review by the LADOT and Planning Departments, Council and Mayor prior to SCS adoption.

After an opportunity for public comment was held, the Committees recommended Council approve the recommendations contained in the joint report as amended. This matter is now forwarded to the Council for its consideration.

Respectfully submitted,

PLANNING AND LAND USE  
MANAGEMENT COMMITTEE



TRANSPORTATION COMMITTEE



**ADOPTED**

OCT 5 2011

**LOS ANGELES CITY COUNCIL**

MEMBER	VOTE
REYES:	YES
HUIZAR:	YES
KREKORIAN:	YES

MEMBER	VOTE
ROSENDAHL:	YES
PARKS:	YES
KORETZ:	YES
PERRY:	ABSENT
HUIZAR:	YES

SG  
9/27/11  
#111/11-1223\_rpt\_plum\_9-27-11.doc

**Not Official Until Council Acts**

**Metro**Los Angeles County  
Metropolitan Transportation AuthorityOne Gateway Plaza  
Los Angeles, CA 90012-2952213.922.2000 Tel  
metro.net

REVISED  
**PLANNING AND PROGRAMMING COMMITTEE**  
**JANUARY 18, 2012**

**SUBJECT: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS' DRAFT  
2012 REGIONAL TRANSPORTATION PLAN / SUSTAINABLE  
COMMUNITIES STRATEGY**

**ACTION: APPROVE COMMENT LETTER**

**RECOMMENDATION**

Approve our comment letter on the Southern California Association of Governments' (SCAG) Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

**ISSUE**

In December 2011, SCAG released the Draft 2012 RTP/SCS for public comment. The RTP/SCS identifies regional transportation priorities for the six-county region through 2035. All 2009 Long Range Transportation Plan (LRTP) projects and priorities must be included in SCAG's RTP/SCS to be eligible for federal funds. We have reviewed the Draft 2012 RTP/SCS and Board authorization is being requested to transmit our comments to SCAG in time for their February 14, 2012 deadline.

**DISCUSSION**

As part of SCAG's role as a regional planning agency, they are responsible for addressing regional issues in the six-county area of Southern California. The 2012 RTP/SCS is the vehicle to provide solutions to regional mobility and land-use issues. For better integration of land-use and transportation, it must also demonstrate reduction of Greenhouse Gas Emissions (GHGe) from passenger vehicles. Per the requirements of SB 375, the Draft 2012 RTP/SCS includes Southern California's first SCS. The SCS is required to analyze how the collective impact of transportation policies, transportation investments and land-use policies affect the GHGe based on population projections in 2020 and 2035. Transportation issues are primarily addressed in the RTP portion of the Draft, and the SCS portion of the Draft presents strategies to meet GHGe targets.

SB 375 compelled SCAG to conduct a more extensive outreach process than has been historically required for RTP development. This process yielded unprecedented levels of public participation and engagement, particularly among environmental and public health advocates championing increased funding for active transportation to reduce GHGe and provide great opportunities for physical activity. The Los Angeles County Department of Public Health was a leading voice in this advocacy.

### Regional Transportation Plan

In general, the Draft 2012 RTP/SCS is a well-written document that properly identifies many of the key transportation issues that the region is facing. It includes all of the projects and programs in our 2009 LRTP. SCAG has proposed new and innovative sources of funding beyond our LRTP program. These funds are for additional projects, regional maintenance of highway and transit facilities, and meeting Federal Clean Air Act conformity requirements.

There are new transportation projects proposed in the Draft 2012 RTP/SCS, within Los Angeles County, which are beyond revenues that the 2009 LRTP assumes to be available from traditional sources. Some of these projects are listed in the Key Projects subsection below. SCAG is assuming that these new projects are funded with a combination of innovative funding (e.g., container fees and public private partnerships) and increased revenues (e.g. gas tax changes and user-fee per mile).

The Draft 2012 RTP/SCS proposes targeted improvements in the transit network and increases in funding for Transportation Demand Management (TDM), Transportation System Management (TSM), and Active Transportation beyond the levels included in the six county transportation commissions' plans, including our 2009 LRTP.

Funding for these improvements is anticipated from a \$0.15 per gallon increase in the gas tax starting in 2017 and ending entirely in 2024. After the gas tax phase-out in 2024, a proposed user-tax of \$0.05 per mile driven, will be phased-in starting in 2025. The goal of the incremental phase-in is so that consumers will not have any large increases of taxes, yet also allow for an indexing to cover the increasing maintenance costs, due to the gas taxes not being indexed to inflation and not increasing with costs.

### Key Projects beyond the LRTP

The following lists Los Angeles County projects identified in the Draft RTP that are not identified in the 2009 LRTP

- East-West Freight Corridor will be studied along a five mile band generally following the SR-60 corridor between the I-710 and the I-15.
- Phase I of the California High Speed Rail Authority (CHSRA) is in the Draft 2012 RTP/SCS in the Constrained Plan, pending an agreement between CHSRA,

Metrolink and LOSSAN to identify funds to bring local systems up to high speed (110+ MPH) where possible.

- A regional Express/HOT Lane Network that expands our Fast Lanes pilot project to include the I-405 and SR-91. This is beyond the federally funded pilot studies on I-10 and the I-110. The Board is on record supporting these two pilot projects, as well as studying the feasibility of a HOT lane on the I-405 from the Orange County Line to LAX.

#### Key Issues

There are several emerging issues that the Draft 2012 RTP/SCS addresses:

- A cordon pricing pilot project feasibility study to be developed with the City of Los Angeles that is included under TDM Measures, and Major Strategic Projects.
- Decreased funding available from federal and state sources and the need to identify new revenue sources is a key RTP concern. SCAG proposes to index the gas tax and to incrementally phase-in user-fees to replace the gas tax starting in 2025.
- The exponential cost of deferred maintenance on highway and transit systems, the need to maintain the regional system in a state of good repair, and the need for additional operations and maintenance funding, is also a key RTP concern.
- The region is anticipated to experience increasing energy costs – residential energy and water use is forecasted as \$19,000 a year in 2035, and the strategies in the SCS reduce it to \$16,000.

#### Sustainable Communities Strategy

The Draft 2012 RTP/SCS demonstrates that the region will achieve the GHGe reduction targets established for the region by the State of California Air Resources Board (ARB), as a requirement of California's Sustainable Communities and Climate Change Protection Act, or Senate Bill (SB) 375.

In addition to the transportation elements of the Draft 2012 RTP/SCS, the plan includes a land-use element that was developed in coordination with local jurisdictions. The land-use element responds to the region's changing demographics and housing market demand. It recommends a growth scenario that will more than double the share of households living in corridors that have frequent transit service by 2035. This land-use element is projected to increase the competitiveness of transit service and reduce vehicle miles travelled.

The land-use element in combination with transportation policies, such as the user tax per mile fee, and transportation investments (such as TDM, TSM and active

transportation), support the region in achieving the mandated ARB targets. The Draft 2012 RTP/SCS provides a projected 8% reduction in GHGe by 2020 and a 16% reduction in GHGe by 2035.

The SCS portion includes policies to increase the number of near-zero and zero emission vehicles operating within the region to reduce GHGe, improve air quality and lessen the region's dependency on fossil fuels.

The Draft 2012 RTP/SCS includes \$6 billion for active transportation, a significant increase from \$1.8 billion in the 2008 RTP. It acknowledges that additional analysis regarding active transportation needs to be conducted in order to develop a better understanding of the users and their needs (bicyclists and pedestrians). In cooperation with SCAG, we have initiated a joint study to develop a strategy to address first-last mile connections to transit in Los Angeles County.

The technical appendices to the Draft 2012 RTP were not available for staff review at the time of the writing of this Board report. Additional technical comments on these appendices may be added to the draft letter.

#### **DETERMINATION OF SAFETY IMPACT**

The comment letter on the Draft 2012 RTP/SCS will not have any adverse safety impacts for our employees and patrons.

#### **FINANCIAL IMPACT**

There is no impact on the FY 2012 budget, as we are only submitting a comment letter to SCAG on their Draft 2012 RTP/SCS.

#### **ALTERNATIVES CONSIDERED**

The Board can modify or choose not to release a formal comment letter. The alternative of not sending a letter is not recommended, as we would lose the opportunity to provide SCAG with comments to enhance the 2012 RTP/SCS document.

#### **NEXT STEPS**

Upon Board approval, the comment letter will be transmitted to SCAG for their consideration in developing their Final 2012 RTP/SCS. SCAG is scheduled to adopt their Final 2012 RTP/SCS at their April 2012 General Assembly meeting.

#### **ATTACHMENTS**

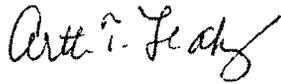
- A. Draft comment letter to SCAG

Prepared by: Brad McAllester, Executive Officer, Long Range Planning  
Heather Hills, Director, Long Range Planning  
Lori Abrishami, Planning Manager, Long Range Planning



---

Martha Welborne, FAIA  
Executive Director of Countywide Planning



---

Arthur T. Leahy  
Chief Executive Officer

Los Angeles  
World Airports

January 20, 2012

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

LAX

LA/Ontario

Van Nuys

City of Los Angeles

Antonio R. Villaraigosa  
Mayor

Board of Airport  
Commissioners

Michael A. Lawson  
President

Valeria C. Vatasco  
Vice President

Joseph A. Aredas  
Robert D. Beyer  
Boyd Hight  
Ann M. Hollister  
Fernando M. Torres-Gil

Gina Marie Lindsey  
Executive Director

Re: Comments on the Draft 2012 Regional Transportation Plan

Dear Mr. Ikhata:

Los Angeles World Airports (LAWA) appreciates the opportunity to comment on the Draft 2012 Regional Transportation Plan (RTP), and is committed to working with all levels of government to address the future transportation needs of Southern California. As the operator of two of the region's commercial airports, Los Angeles International (LAX) and Ontario International (ONT), and operator of Van Nuys General Aviation Airport (VNY), LAWA plays an important role in meeting the region's demands for air travel and goods movement.

LAWA, as a proprietary department of the City of Los Angeles, is responsible for operating its airports in a safe, efficient, and fiscally responsible manner on behalf of our passengers and the citizens of each market service area. Furthermore, we must operate within the constraints placed upon our resources by federal law and regulation, along with our contractual obligations to our tenants and partner agencies. It is in this context that LAWA provides the following comments to the Aviation and Airport Ground Access portion of the RTP:

1. Use of Airport Funds

LAWA's first priority is to maintain safe and efficient airports. Our revenues and expenditures are used to support that effort and fulfill our commitment to supporting the national airspace system. All airports have a tremendous demand for capital improvements.

As such, most airports depend on financial support from the FAA via grant funds for eligible construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property. Using airport funds for non-airport functions violates federal law and jeopardizes the airport's ability to receive federal grants.

PC DOC 294681

Nevertheless, LAWA seeks to partner with SCAG to find solutions to support ground access improvements to airports, other primary transportation facilities, and "secondary" airports in the region.

## 2. Use of Airport Express Buses

The RTP includes an "Action Step" which would plan and promote a regional system of airport express buses, modeled in part on the FlyAway<sup>®</sup> service currently operating at LAX. LAWA agrees that express buses are a promising solution to certain ground access problems. However, it has been LAWA's experience that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service.

LAWA has spent a great deal of resources carefully studying the feasibility of establishing new FlyAway<sup>®</sup> routes to serve LAX. However, even for LAX, with its extensive market area and passenger base, it has been a challenge to find station locations that are both viable and successful. LAWA invites SCAG to continue examining ways to bring similar projects to other airports, but cautions that these services, by themselves, may not be effective in increasing passenger demand at "secondary" airports.

## 3. Aviation Activity Constraints

LAWA agrees that the aviation activity constraints in the region, and potential dispersion of that activity at other airports, should be re-examined in subsequent regional plans.

## 4. Additional Technical Clarifications

LAWA also wants to offer the following technical clarifications and comments to the RTP:

- SCAG has reported a number of vehicle trips to LAX under existing conditions as well as under a future forecast for 2035, citing the LAX Master Plan EIR/EIS as a justification for those trip numbers. However, the numbers reported do not correspond to data that LAWA has previously reported or used in any environmental analysis. LAWA requests clarification of those data points.
- LAWA recommends the following changes to Tables 4-6 and 4-7 in the Aviation and Airport Ground Access sections of the RTP:
  - In Table 4-6, the following projects should be included in the list of projects completed since the project notice of preparation in 2008 (footnote 1): Douglas St., La Cienega Blvd., Lincoln Blvd. (all), Nash St.,

Sepulveda Blvd. (both), the I-105 westbound off-ramp at Sepulveda Blvd., and the I-405 at SR-90.

- Two other projects on Table 4-6, Arbor Vitae St., and the I-405 from I-10 to SR-101, are under construction as of January 2012.
- In Table 4-7, Project LAX-19, which includes Lincoln Blvd. improvements, has already been completed.
- LAWA recommends that SCAG include in the RTP a portion of the project referred to as LAX-10, widening Aviation Blvd. from Century Blvd. to Manhattan Beach Blvd. to 3 lanes in each direction.

5. 2011 Air Passenger Survey

Lastly, the 2006 LAX Air Passenger Survey was used to create several data points within this section of the RTP. LAWA is hoping to unveil the results of its 2011 Air Passenger Survey in February of this year. SCAG should consider updating its Appendix with this new data as it finalizes the RTP. LAWA will post the results of this survey on our website (<http://www.lawa.org>) once the report is completed.

Thank you for the opportunity to review the 2012 Draft RTP. We hope that these comments will be helpful in developing a successful plan for the region. If you have any questions regarding these comments, please contact Diego Alvarez, Regional Transportation Coordinator, at 424-646-5179 or [dalvarez@lawa.org](mailto:dalvarez@lawa.org).

Sincerely,



Michael D. Feldman  
Deputy Executive Director

MDF:DA:yl

DEPARTMENT OF  
CITY PLANNING  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
AND  
6262 VAN NUYS BLVD., SUITE 351  
VAN NUYS, CA 91401

CITY PLANNING COMMISSION

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PRESIDENT  
REGINA M. FREER  
VICE-PRESIDENT  
SEAN O. BURTON  
DIEGO CARDOSO  
GEORGE HOVAGUIMIAN  
JUSTIN KIM  
ROBERT LESSIN  
BARBARA ROMERO  
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JAMES WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT II  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



ANTONIO R. VILLARAIGOSA  
MAYOR

Attachment D

EXECUTIVE OFFICES

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INFORMATION  
[www.planning.lacity.org](http://www.planning.lacity.org)

January 30, 2012

The Honorable City Council  
City of Los Angeles  
Room 395, City Hall

Dear Honorable Members:

DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE  
COMMUNITIES STRATEGY

The Department of City Planning (DCP) has reviewed and prepared comments for your consideration regarding the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).

The 2012-2035 RTP/SCS includes land use strategies for addressing the region's mobility needs and desires for healthy, sustainable communities. DCP has worked with SCAG to ensure that the City's land use plans and programs are incorporated and the City's interests addressed in this long-range regional plan. This work has included collaboration with SCAG over the past two years to prepare the population, household and employment growth forecast for the City, ensure that this anticipated growth is consistent with the capacity reflected in City's land use plans, and ensure that this long-term growth is located according to the City's land use plans.

DCP staff has identified five issues related to land use, and recommends changes to the 2012-2035 RTP/SCS to better support the City's interests and role in the regional plan, presented in the draft letter to SCAG attached to this report. These include:

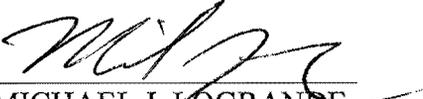
- A. Clarify the definition of "High Quality Transit Areas" where growth is focused;
- B. Clarify the definition of "Urban Centers" where growth is focused;
- C. Correct inaccurate representations of land uses and potential growth around station areas;
- D. Incorporate the 1,684 miles of bicycle facilities identified in the City's 2010 Bicycle Plan; and,
- E. Clarify the role of recently enacted streamlining provisions under the California Environmental Quality Act.

**RECOMMENDATIONS**

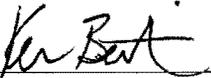
- 1) **Approve** DCP staff recommendations regarding the Draft 2012-2035 RTP/SCS.
- 2) **Direct** DCP staff to forward recommendations to SCAG.

**FISCAL IMPACT**

The proposed recommendations will have no fiscal impact on the General Fund.

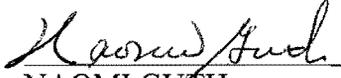
  
\_\_\_\_\_  
MICHAEL J. LOGRANDE  
Director of Planning

  
\_\_\_\_\_  
ALAN BELL, AICP  
Deputy Director

  
\_\_\_\_\_  
KEN BERNSTEIN, AICP  
Principal City Planner

for   
\_\_\_\_\_  
FAISAL ROBLE  
Senior City Planner

  
\_\_\_\_\_  
CLAIRE BOWIN, AICP  
City Planner

  
\_\_\_\_\_  
NAOMI GUTH  
City Planning Associate

Attachment

## ATTACHMENT

[Date]

Ms. Margaret Lin  
Southern California Association of Governments  
818 W. Seventh St., 12<sup>th</sup> Floor  
Los Angeles, CA 90017

Dear Ms. Lin:

### **DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY**

The purpose of this letter is to provide comments from the City of Los Angeles Department of City Planning (DCP) regarding the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). DCP appreciates the collaborative relationship with SCAG in developing this plan, which has included working together on the integrated growth forecast and understanding the City's land use plans and programs.

The following addresses five land use issues and recommends changes to the 2012-2035 RTP/SCS in order to better address the City's land use plans and projected growth. This includes:

- A. Clarify the definition of "High Quality Transit Areas" where growth is focused;
- B. Clarify the definition of "Urban Centers" where growth is focused;
- C. Correct inaccurate representations of land uses and potential growth around station areas;
- D. Incorporate the 1,684 miles of bicycle facilities identified in the City's 2010 Bicycle Plan; and,
- E. Clarify the role of recently enacted streamlining provisions under the California Environmental Quality Act.

#### **A. High Quality Transit Areas and Growth Patterns**

The SCS frames growth patterns, in part, in terms of being within or outside of "High Quality Transit Areas (HQTAs)." An HQTA is defined as, "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well-served transit stop with 15-minute or less service frequency during peak commute hours." HQTA boundaries are graphically portrayed in exhibits throughout the SCS. For the City of Los Angeles, the vast majority of the City's land area falls within HQTA boundaries, as seen in the following Exhibits: 4.4, 4.9, 4.13, 4.15, and Exhibits 19, 20 and 21 in the SCS Background Documentation (see Attachment).

These HQTA boundaries encompass all neighborhoods within a ½ mile radius and appear to indicate that growth will take place throughout the area, including low density single-family

neighborhoods and industrial districts. In fact, the City is far more discriminating, and adopted land use plans reflect carefully studied areas where growth can be absorbed. Generally, land use changes to accommodate growth are typically at transit stops and on parcels fronting transit corridors. Single-family neighborhoods are generally preserved.

Recommendation: The City recommends that additional explanation be included on pages 112-113 to better describe where growth is accommodated, as indicated by the following underlined text:

“A HQTAs is generally a walkable transit village or corridor, consistent with the adopted RTP/SCS , that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well-serviced transit stop with 15-minute or less service frequency during peak commute hours. This was represented by the proportion of Greenfield versus Refill (infill and redevelopment) growth in each of the scenarios. Within these boundaries, growth within a given jurisdiction is consistent with the integrated growth forecast for that jurisdiction and is distributed according to the jurisdiction’s land use plans. Thus, while areas within ½ mile of a transit stop or corridor are walkable in relation to transit, not all such areas are targeted for growth and/or land use changes.”

## **B. Urban Centers and Growth Patterns**

The SCS frames the overall land use pattern across the SCAG region around six factors. The HQTAs, discussed above, are one factor. Another factor is the region’s urbanized core versus peripheral areas. Urbanized core areas, or “core centers,” are defined in the SCS as, “areas where strategies such as compact community design, mixed-use development, redevelopment of aging retail areas, greater housing variety, and additional transit service are more likely to succeed.” Exhibit 4.5, Urban Centers SCAG Region (see Attachment), depicts the locations of these urban centers. However, these urban centers do not appear to align with the urban centers identified in Exhibit 4.15 for areas within the City of Los Angeles.

Recommendation: The City recommends that the relationship between Exhibit 4.5 and Exhibit 4.15 be clearly described. If the two exhibits are intended to illustrate the same urbanized areas, staff recommends that the color scheme used in Exhibit 4.15 also be used in Exhibit 4.5.

## **C. Land Uses around Station Areas**

The SCS projects higher density in urban centers, and anticipates growth in transit rich areas throughout the City of Los Angeles in order to demonstrate a decrease in GHG emissions by 2035. DCP staff compared the city’s General Plan Land Use to the SCS Land Use Pattern Maps and has found that in general the SCS is consistent with the City’s land use density and land use designations. However, in closely examining 76 rail and bus transit station areas, DCP staff has found instances of inflated density, which inaccurately reflects the General Plan distribution of growth.

Exhibit 21 Land Use Pattern Map 2035 (see Attachment) identifies urban centers with densities that are not consistent the community plans for these areas. Such centers would have residential densities ranging from 82 to 120 housing units or more per acre. This density is typical in the Central City and some adjacent neighborhoods, and is proposed for the Warner Center, but it is generally not appropriate throughout the rest of the city.

In addition, the following issues were found in multiple station areas.

Multi-Family neighborhoods

Densities up to 178, 145, or 61 units/acre that are too high for many sites

Densities too high in areas adjacent to single-family neighborhoods

Single-Family neighborhoods

Increase in density in strictly single-family areas that are stable and where no growth is anticipated

Parcels and Corridors in Historic Preservation Overlay Zones reflect density designations that are too high; these areas are stable with no projected change

Residential uses reflected as commercial

Commercial Corridors

Density projections are too high

Industrial Land Use

Industrial areas that are to be preserved as industrial are inaccurately represented as commercial or retail

Industrial areas that show residential designations are an inaccurate reflection as these sites are preserved

Public Facilities

Land use changes at school sites that are not projected to change

High residential densities or commercial uses projected on public facilities such as along freeways, county jail, open space

Recommendation: The City recommends that more appropriate representations of land use around station areas be made, which can be identified on detailed annotated maps of the station areas and provided under separate cover.

## **D. Proposed Bikeways**

The SCS emphasizes the importance of active transportation options in meeting the mobility needs of the SCAG region, including walking and biking. While SCAG has proposed a regional bikeway network, the SCS includes the contributions of localities in developing bicycle networks within the locality and linking to other transit modes, reflected in Exhibit 4.11 Proposed Bikeway Network SCAG Region (see Attachment). However, it appears that the City of Los Angeles' recently adopted 2010 Bicycle Plan for 1,684 miles of bike facilities across Los Angeles is not included in this Exhibit. Some segments of this bicycle network are in development and have been identified for funding, and are therefore included in the 2012 RTP list of transportation investments. Including the full proposed bicycle network will support the long-term commitment to pursue resources for development of the network.

Recommendation: The City recommends that the SCS include the bicycle facilities identified in the City's 2010 Bicycle Plan.

### **E. CEQA Streamlining Incentives for Sustainable Land Use Patterns**

The 2012-2035 RTP/SCS directly addresses the opportunity for relief under the California Environmental Quality Act (CEQA). Under Senate Bill 375, the requirement to prepare a Sustainable Communities Strategy (SCS) was coupled with incentives to encourage sustainable development and implementation of an SCS. The incentives are comprised of relief under CEQA, such as streamlined documentation or exemption from environmental review requirements, for specific development types in specific locations, as long as such development is consistent with the land use reflected in the SCS. As any proposed development is considered by local jurisdictions, this CEQA relief is at the discretion of local jurisdictions. However, as written, the 2012-2035 RTP/SCS can be construed to indicate that CEQA relief is part of the land use plan and is available by right to all development that meets the qualifications.

Recommendation: The City recommends that the 2012-2035 RTP/SCS better reflect the opportunity for CEQA streamlining incentives through the following changes:

- 1) In the discussion of the mandate to prepare an SCS (page 106 of the 2012-2035 RTP/SCS), amend the last sentence of the second to last paragraph:  
“In addition, some projects consistent with the SCS are may be eligible for streamlined environmental review.”
- 2) In Exhibits 4.1, 4.2 and 4.3 regarding population, employment and household growth, respectively (see Attachment), remove the depiction of Transit Priority Project (TPP) areas. A TPP is one particular type of development that qualifies for CEQA streamlining. Depicting this in these exhibits is confusing because a TPP is not defined. Furthermore, the depiction of TPP boundaries detracts from the purpose of the exhibits, which is to show where growth is directed over the planning period of the 2012-2035 RTP/SCS.
- 3) In the discussion of Transportation Analysis Zones (TAZs) and Development Types (page 122 of the 2012-2035 RTP/SCS), remove the brief discussion regarding CEQA streamlining and the adequacy of TAZ-level land use information. First, this point is difficult to understand as presented and requires further explanation. Second, this point pertains to incentives available to jurisdictions and developers, not to the modeling analysis. Lastly, this point detracts from the purpose of the section, which is to describe the approach to modeling land use and transportation information. This paragraph would thus read:  
“To conduct required modeling analysis for the RTP/SCS, SCAG distributes the growth forecast data to transportation analysis zones (TAZs) to capture localized effects of the interaction of land use and transportation. Additionally, ~~SB-375 offers local governments potential CEQA relief for qualified development projects consistent with an~~

~~adopted SCS. SCAG suggests that utilizing community types at the TAZ level of geography (with an average size of 160 square acres) offers local jurisdictions adequate information and flexibility to make appropriate consistency findings for projects to be eligible to receive CEQA streamlining benefits.~~

To further facilitate regional modeling of land use information from nearly 200 separate jurisdictions, SCAG developed a simplified series of Community Types to represent the land use categories taken from the region's many general plans..."

- 4) A reference to the summary of the CEQA incentive (page 148 of the 2012-2035 RTP/SCS) should be included under the section "RTP/SCS Next Steps" and the summary should be moved to follow this because the incentive can be used to encourage and facilitate implementation of the SCS and is therefore better understood as a "next step." In addition, the summary should include a discussion regarding a jurisdiction's discretion in certifying the environmental review for a project, regardless of eligibility for streamlining.
- 5) In the SCS Background Documentation, the summary of the CEQA exemption (page 84) should include a description of a jurisdiction's discretion in certifying the environmental review for a project, regardless of eligibility for streamlining.

Thank you for this opportunity to provide comments. If you have any questions or would like additional information, please contact Naomi Guth at (213) 978-3307 or by email at [Naomi.Guth@lacity.org](mailto:Naomi.Guth@lacity.org).

Sincerely,

MICHAEL J. LOGRANDE  
Director of Planning

Attachment

CC: Ken Bernstein, Principal City Planner  
Naomi Guth, City Planning Associate

EXHIBIT 4.4 Compass Blueprint Demonstration Projects

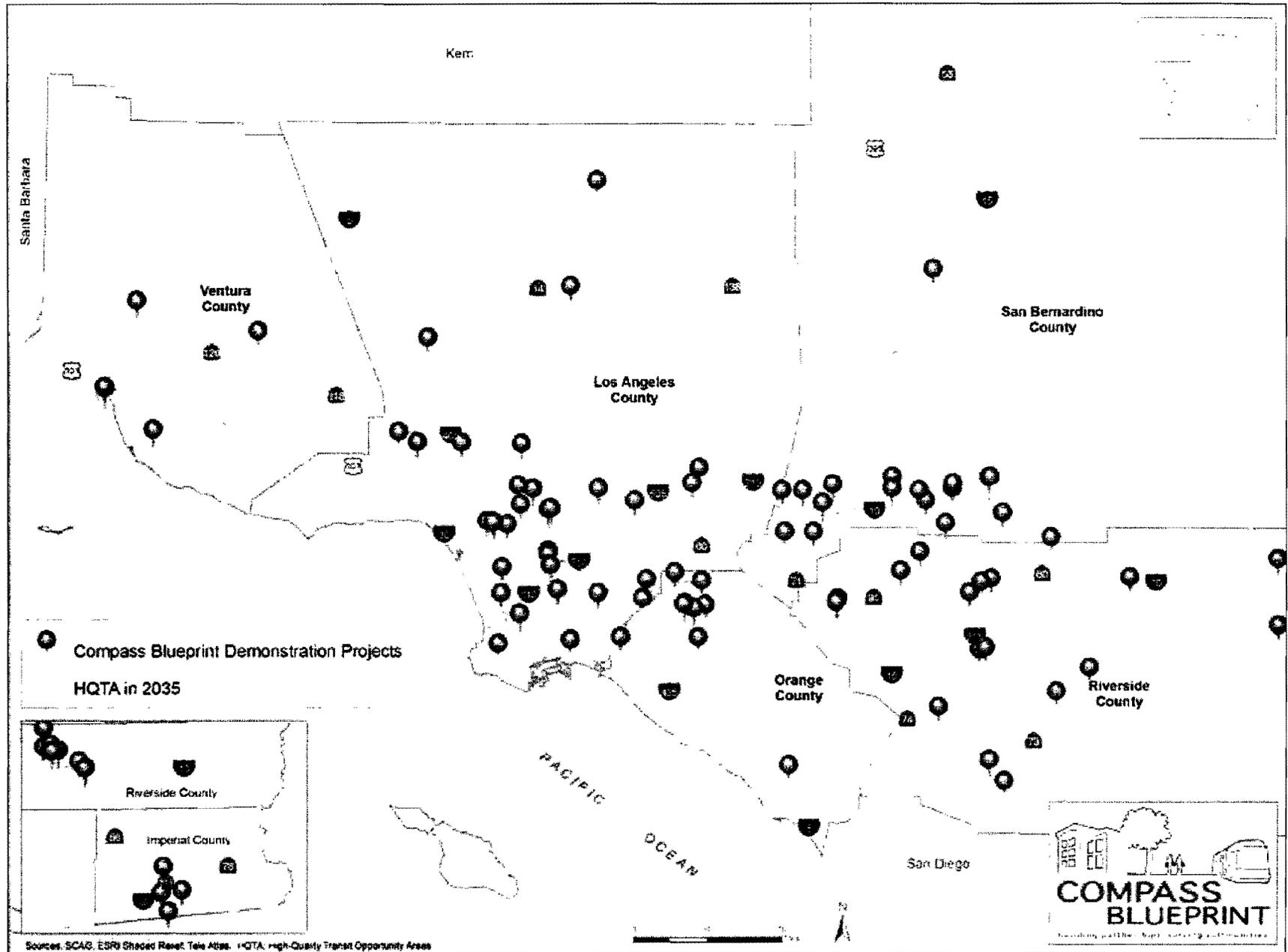




EXHIBIT 4.13 Land Use Pattern SCAG Region (2035)

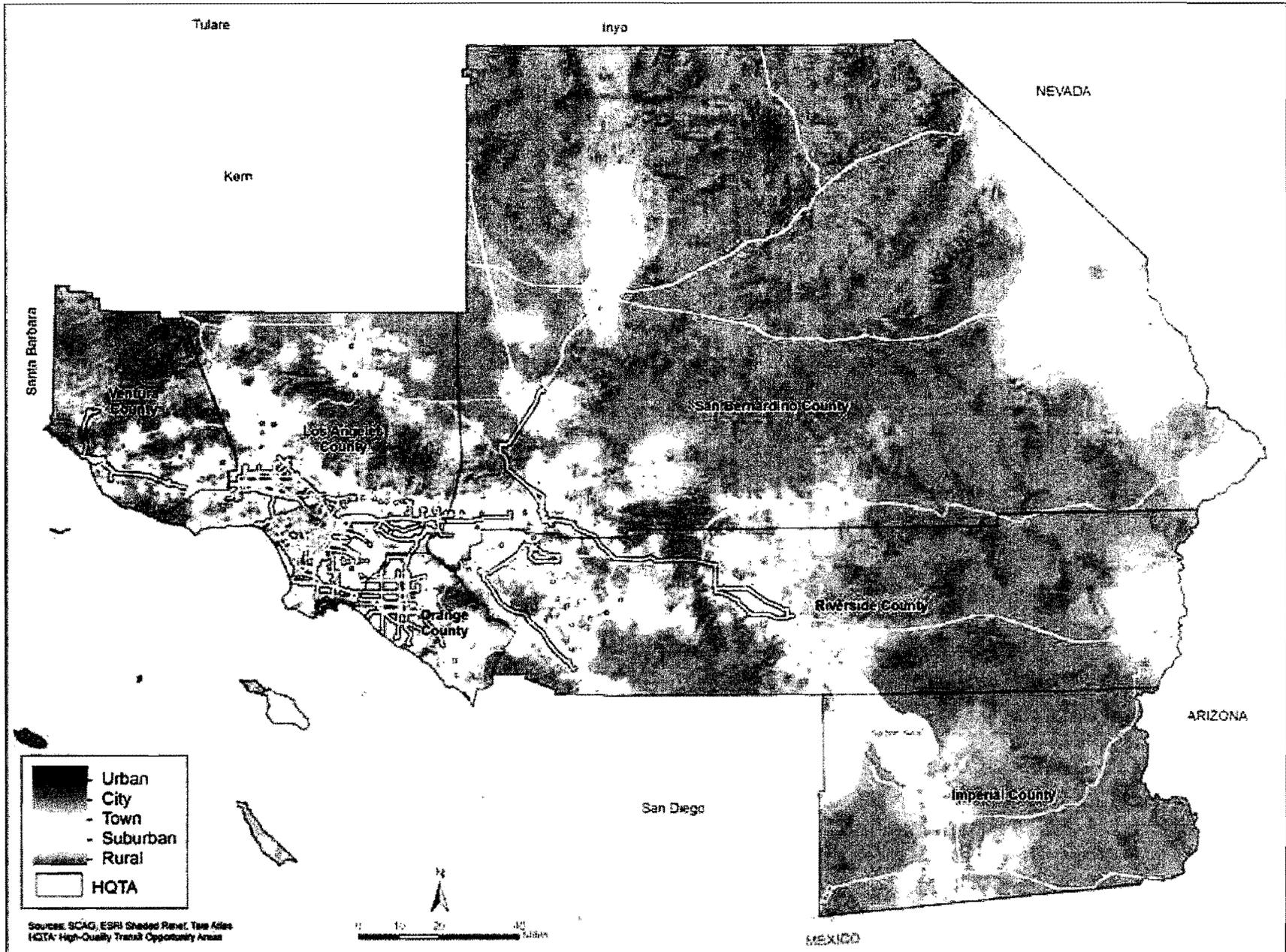


EXHIBIT 4.15 Land Use Pattern Los Angeles County (2035)

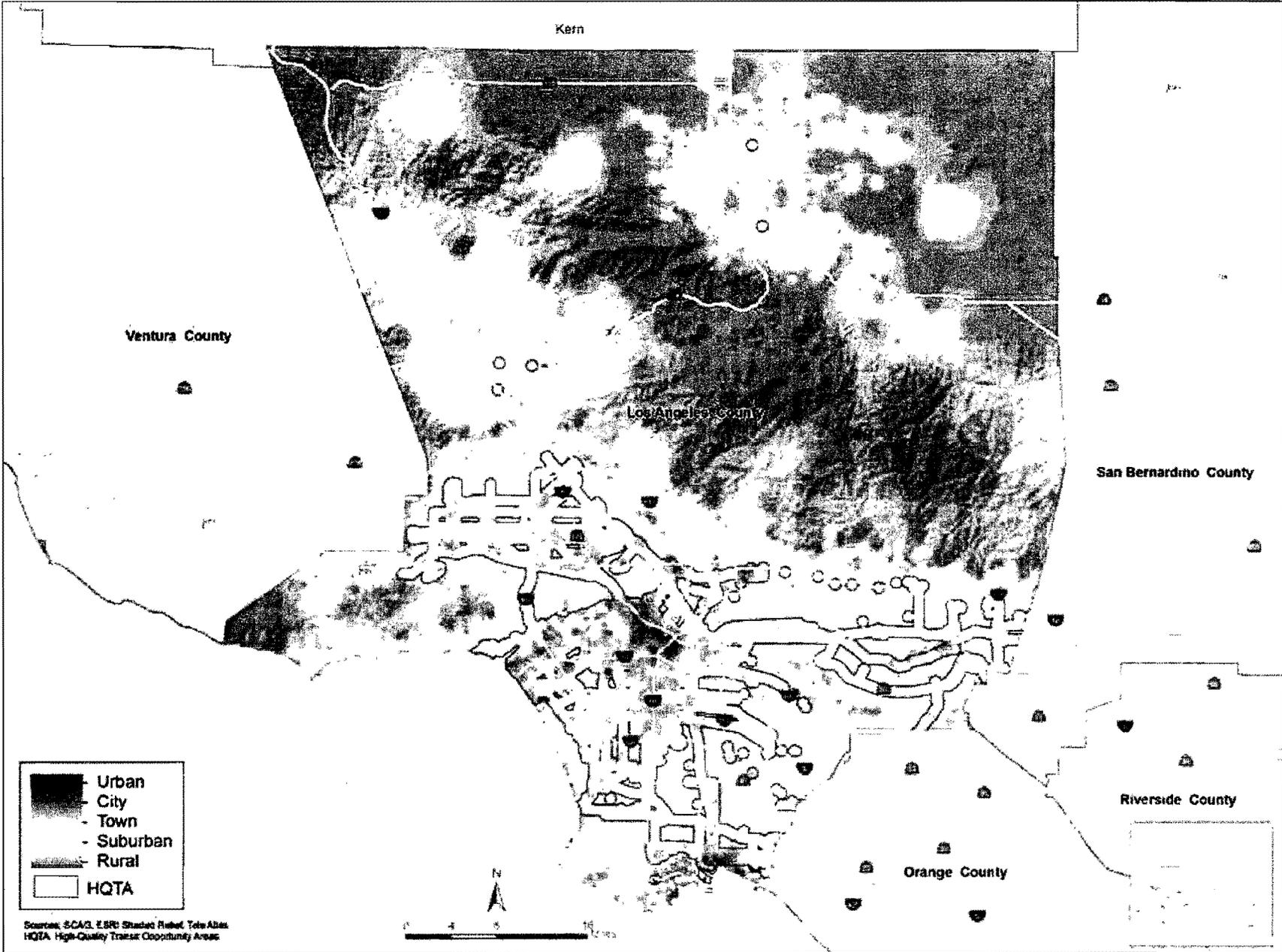


EXHIBIT 19 Land Use Pattern Map - City of Los Angeles 2008

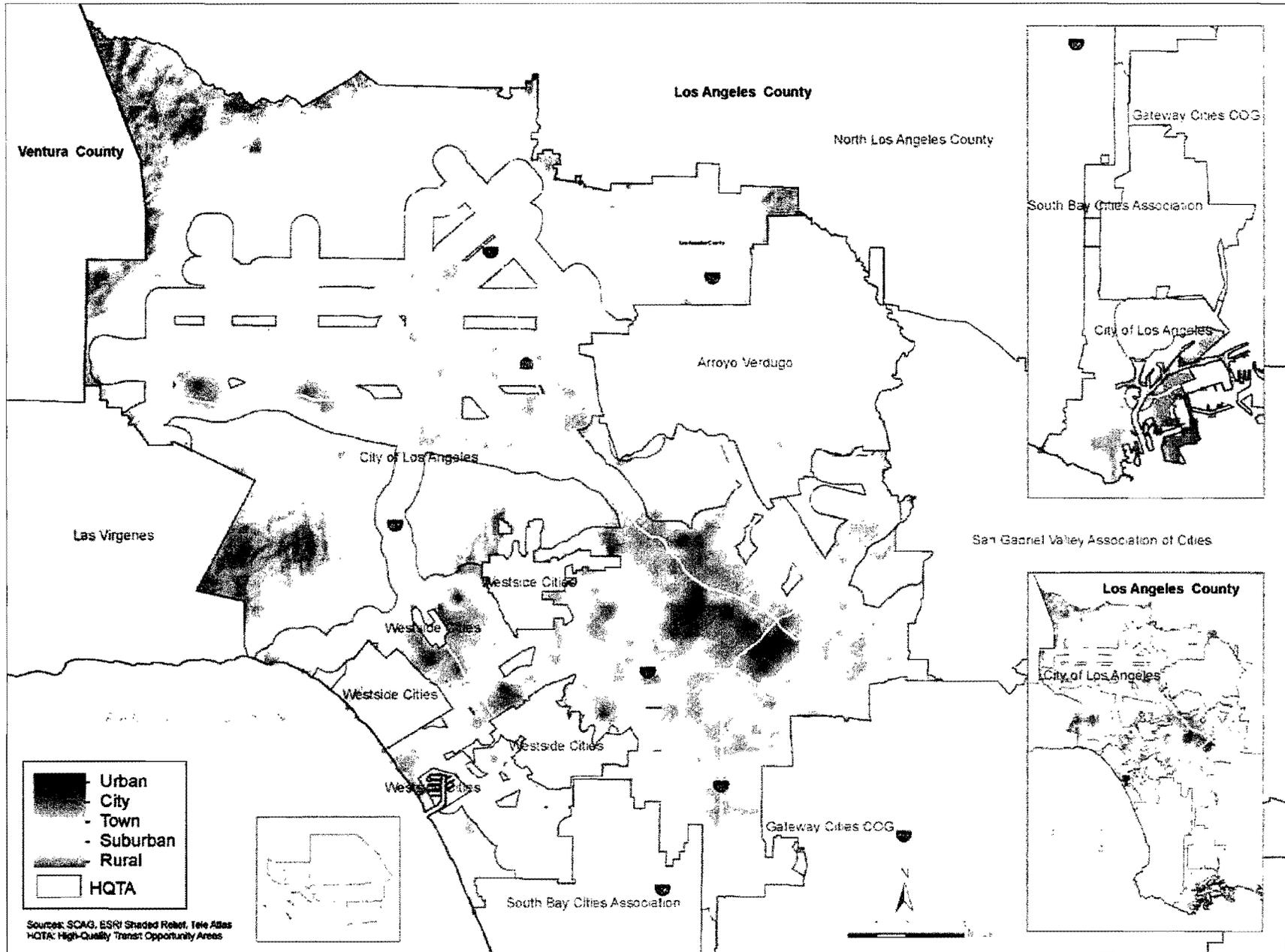


EXHIBIT 20 Land Use Pattern Map - City of Los Angeles 2020

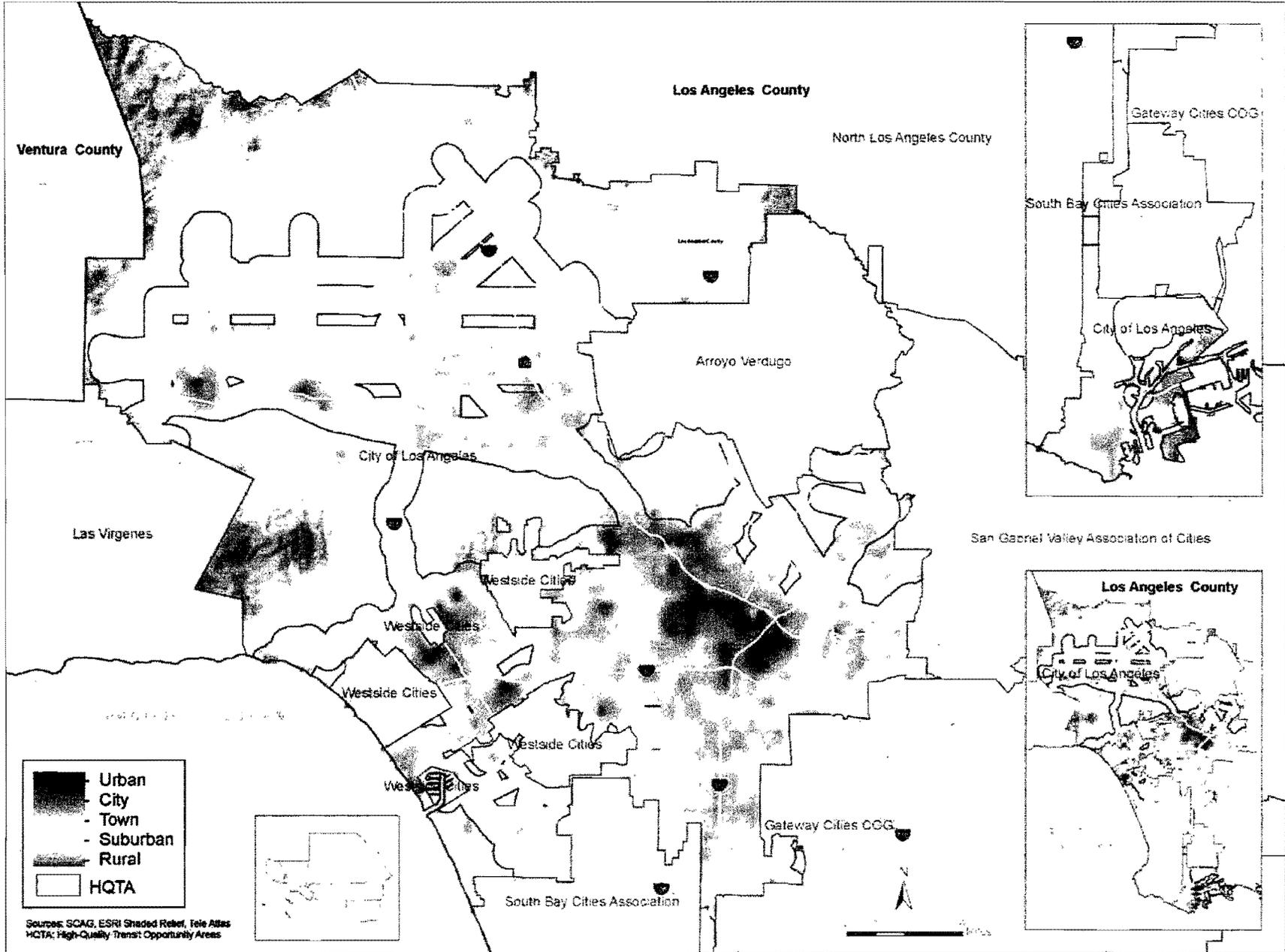


EXHIBIT 21 Land Use Pattern Map - City of Los Angeles 2035

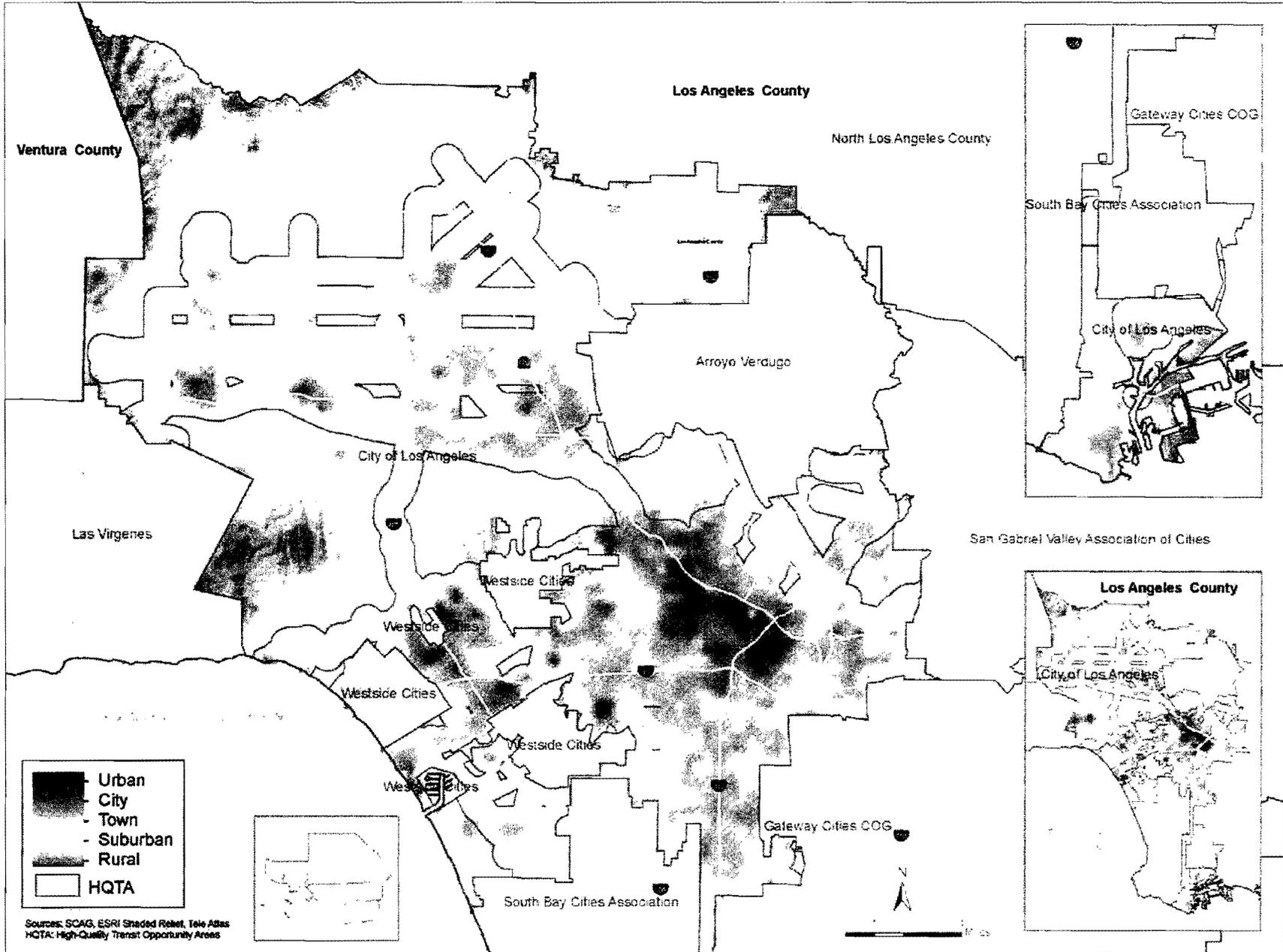


EXHIBIT 4.5 Urban Centers SCAG Region

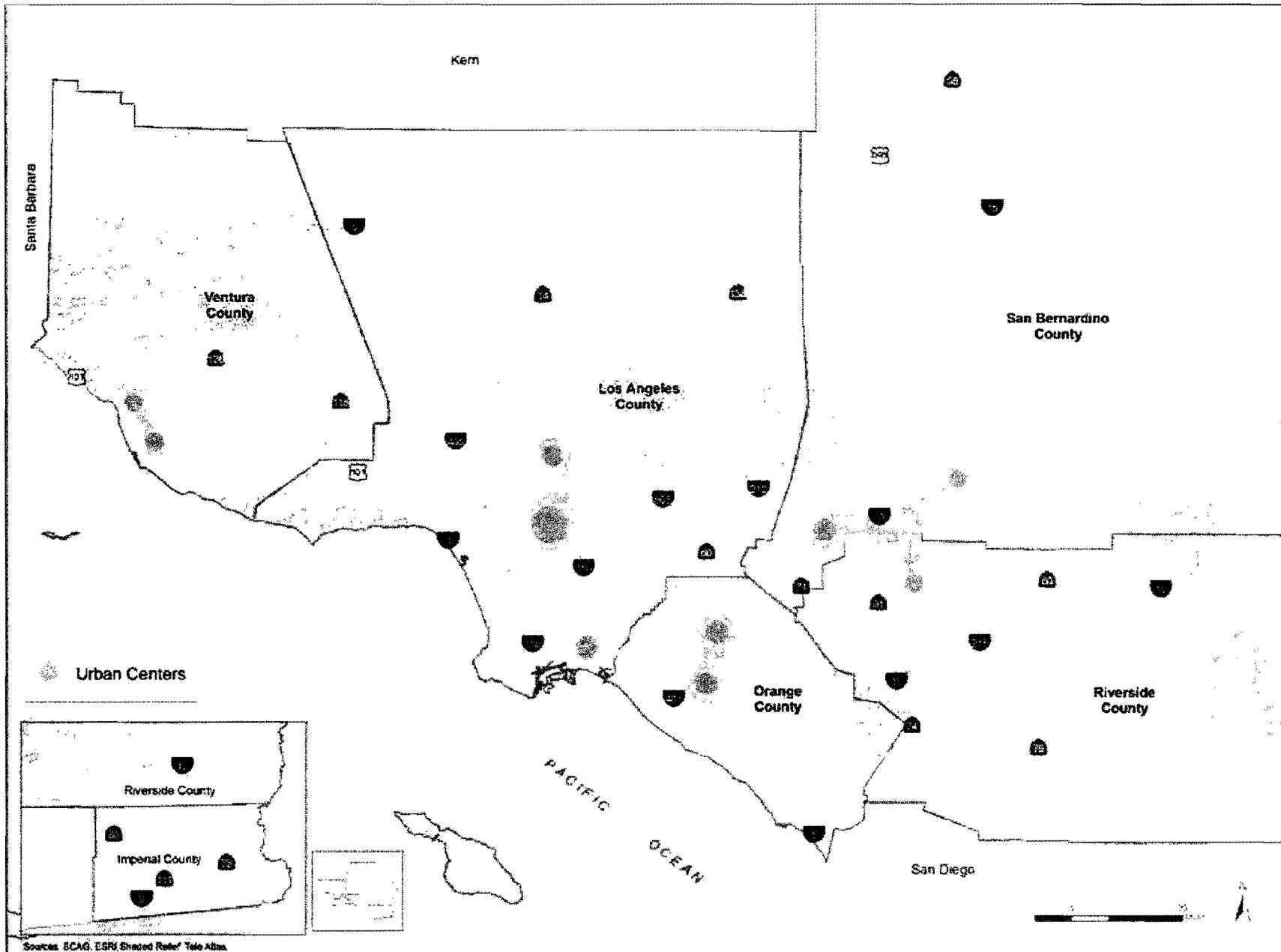


EXHIBIT 4.11 Proposed Bikeway Network SCAG Region

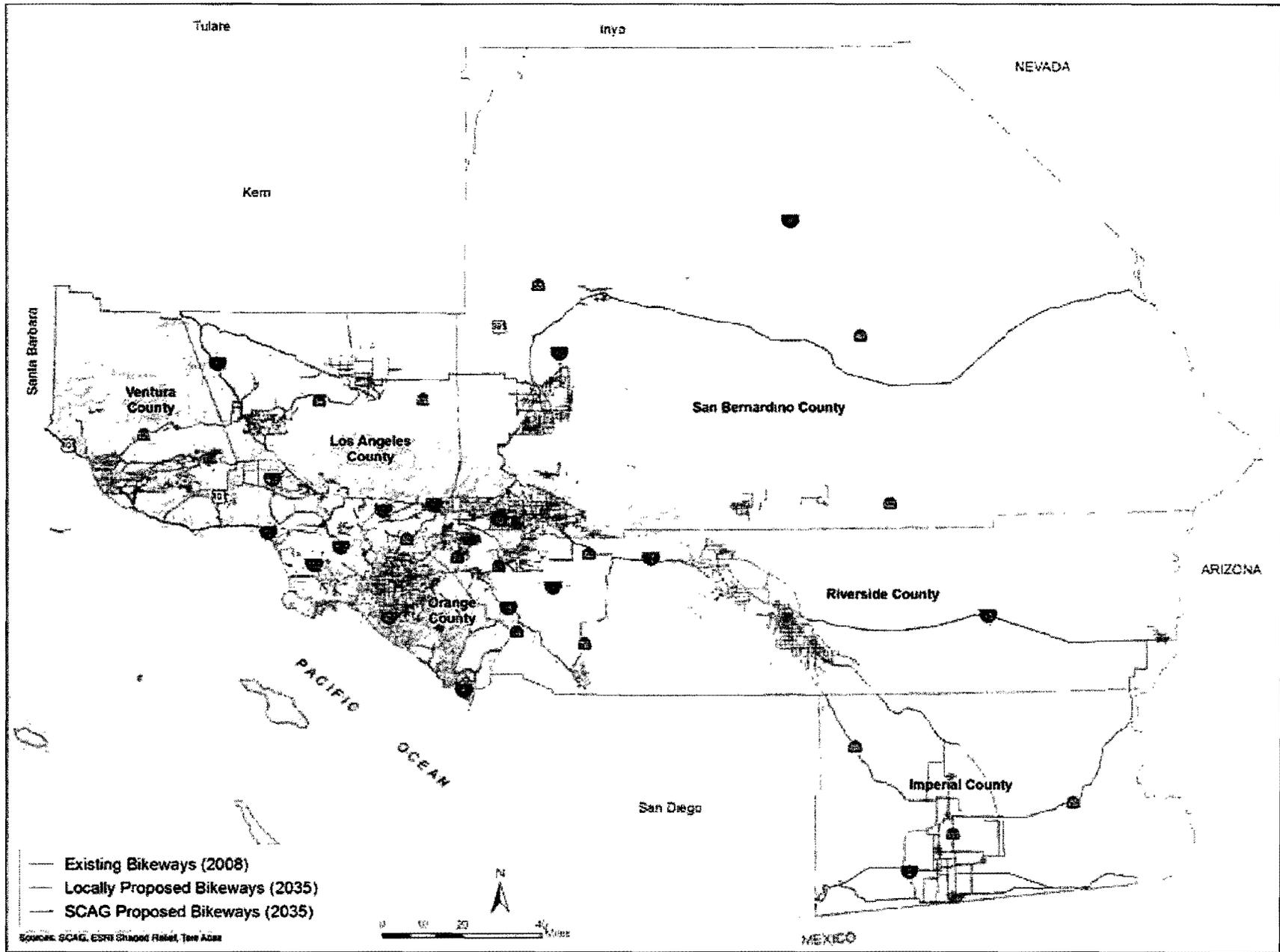


EXHIBIT 4.1 Population Growth SCAG Region (2035)

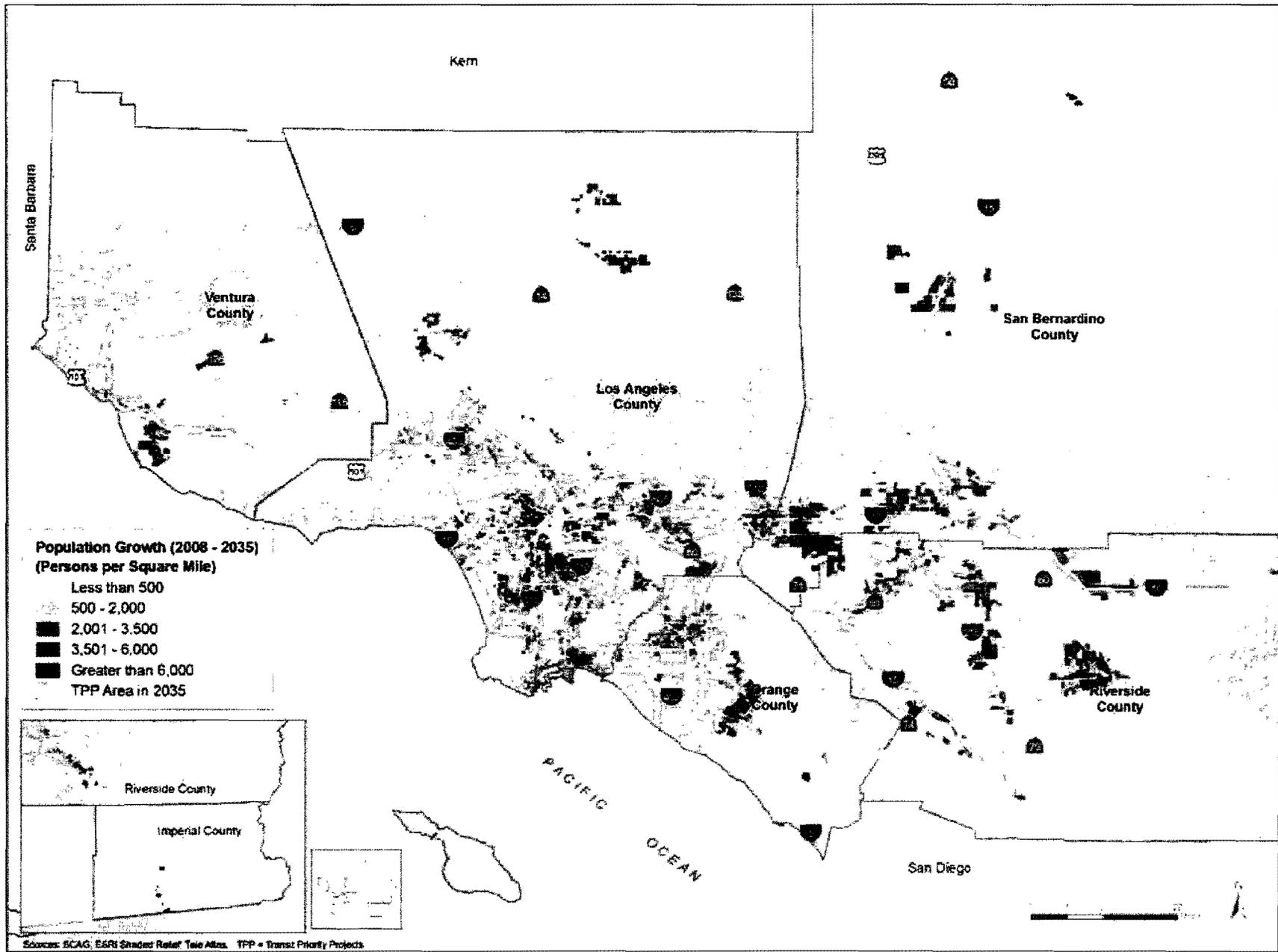


EXHIBIT 4.2 Employment Growth SCAG Region (2035)

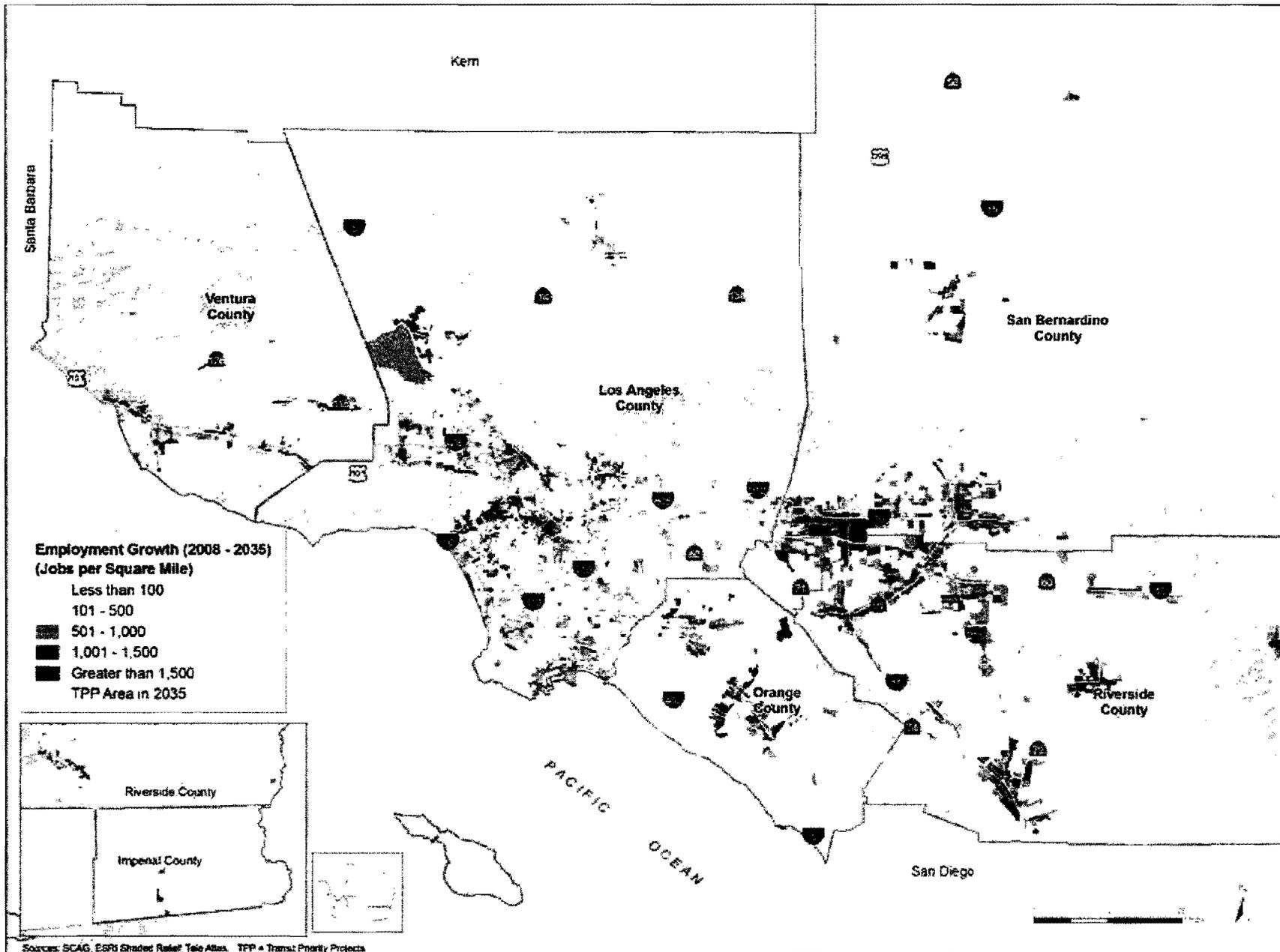
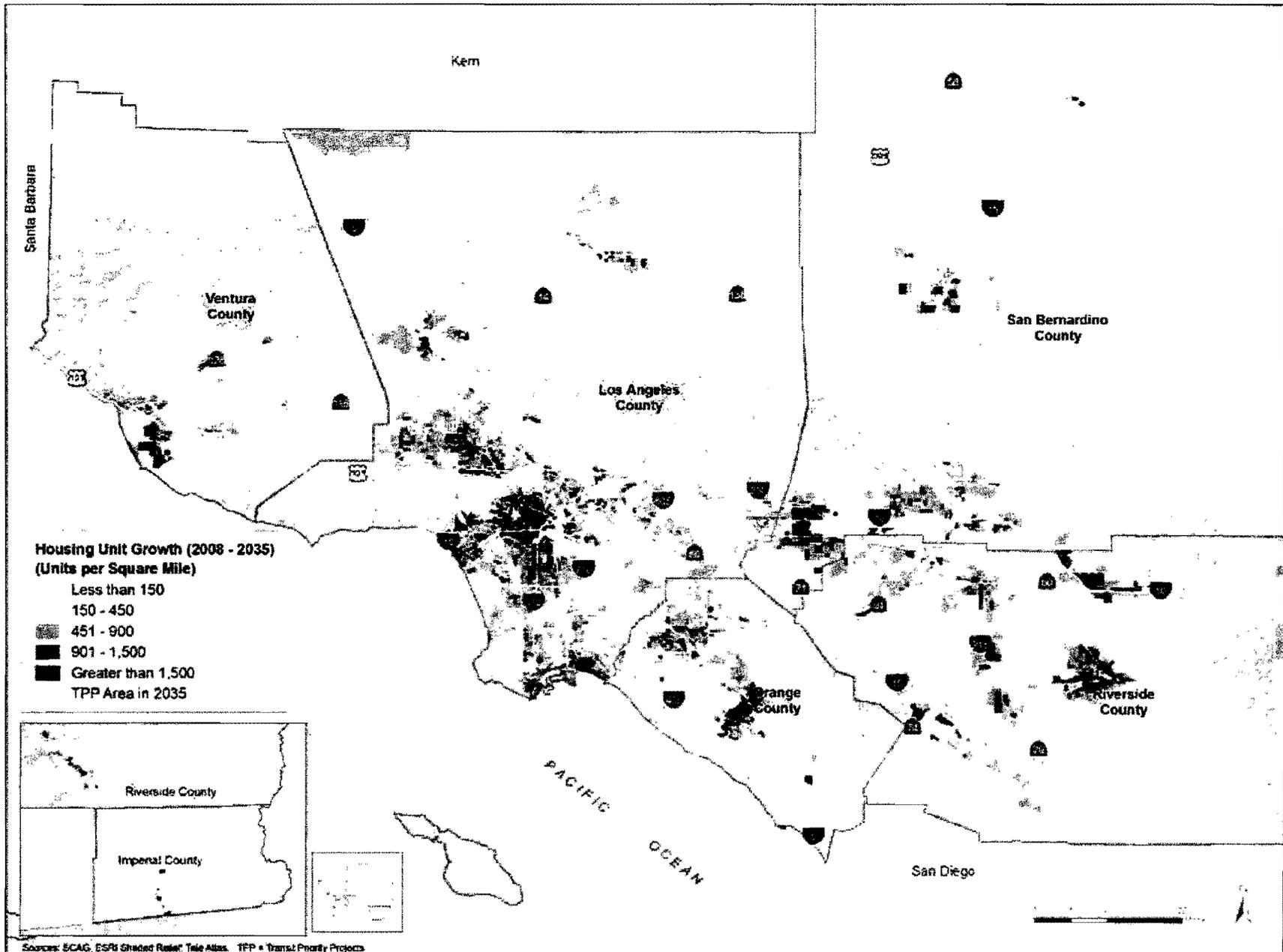


EXHIBIT 4.3 Housing Unit Growth SCAG Region (2035)



## City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS

Strategic Projects							
County	System	Category	Route Name	From/At	To	Project Description	Lead Agency
Los Angeles	Local Highway	Capacity	11th Street	Aviation Blvd	La Cienega Blvd	Widen and restripe to accommodate two through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Alameda Street	US-101 Fwy	I-10 Fwy	Widen to 70 ft and remove embedded rails and ties, install left turn channelization and widen curb returns to reduce congestion and improve truck movement	Los Angeles City
Los Angeles	Local Highway	Capacity	Alameda Street	I-10 Fwy	7th St	Alameda St. from I-10 to Seventh St. - project includes rehabilitation of the roadway, removing embedded rails and ties, installing left turn channelization, spot widening where needed to accommodate truck traffic	Los Angeles City
Los Angeles	Local Highway	Capacity	Alhambra Avenue	Lowell Ave	City of Alhambra city limits	Realign Alhambra Ave. between Lowell Ave. and the City of Alhambra city limits to smooth out an existing sharp s-curve and to enhance traffic and capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	Anaheim Street	Farragut Ave	Dominguez Channel	Widen Anaheim St. from 78' to 84' and restripe to accommodate an additional lane in each direction; this would improve the roadway from 4 lanes to 6 lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Aviation Boulevard	Arbor Vitae St	Imperial Hwy	Widen and restripe to accommodate three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Balboa Boulevard	Devonshire St		Widen east side of Balboa Blvd. south of Devonshire St. for approximately 500 ft., and restripe the intersection to provide dual left-turn lanes for the northbound and southbound approaches	Los Angeles City
Los Angeles	Local Highway	Capacity	Barham Boulevard	US-101 Fwy Bridge		Replace the existing bridge to increase traffic capacity and widen/restripe southbound US-101 off-ramp at Barham Blvd to provide southbound double left turn lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Barham Boulevard	Coral Dr		Widen west side of Barham Blvd. to provide a southbound right-turn only lane on Barham Blvd. and to improve access to Universal Studios and to the 101 NB on-ramp.	Los Angeles City
Los Angeles	Local Highway	Capacity	Beverly Glen Boulevard	Mulholland Dr		Widen south leg of Beverly Glen Blvd to create a right turn only lane; ROW acquisition needed	Los Angeles City
Los Angeles	Local Highway	Capacity	Brandford Street	Laurel Canyon Blvd	Amboy Ave	Widen north side of Brandford St. to provide an additional westbound lane.	Los Angeles City
Los Angeles	Local Highway	Capacity	Broad Avenue	Harry Bridges Blvd	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 side of Broad Ave	Los Angeles City
Los Angeles	Local Highway	Capacity	Bundy Drive	I-10 Fwy ramps		Reduce congestion on Bundy by reconfiguring the I-10 WB ramps (consolidate to one ramp location accommodating both the on and off ramps with new signal)	Los Angeles City
Los Angeles	Local Highway	Capacity	Burbank Boulevard	Clybourne Ave	Vineland Ave	Widen Burbank Blvd. to a major highway standard (80-foot roadway width) on both sides of street to improve roadway capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	Burbank Boulevard	US-101 Fwy WB		Widening to add second westbound through lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Canoga Avenue	US-101 WB off-ramp		Widen westbound off-ramp to provide a right turn only lane to Canoga Ave	Los Angeles City
Los Angeles	Local Highway	Capacity	Canoga Avenue	Burbank Blvd		Widening to add a second westbound left-turn lane and a dedicated northbound right-turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Transit	Canoga Avenue	Ventura Blvd	Canoga Orange Line Station	Purchase 20 new buses to add to a Local Circulator bus system between Ventura Boulevard and Canoga Orange Line Station. Install new bus shelters and/or enhance the existing bus shelters along the route as required	Los Angeles City
Los Angeles	Local Highway	Capacity	Canoga Avenue	Saticoy St		Widening to add southbound through lane. Change southbound and eastbound phasing from left-turn permitted to protected.	Los Angeles City
Los Angeles	Local Highway	Capacity	Coldwater Canyon Boulevard	Ventura Blvd	Magnolia Blvd	Remove jut-outs to add one through lane in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Corbin Avenue	Victory Blvd		Widening to add eastbound and westbound through lanes and upgrade traffic signal	Los Angeles City

## City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS

Strategic Projects							
County	System	Category	Route Name	From/At	To	Project Description	Lead Agency
Los Angeles	Local Highway	Capacity	Crenshaw Boulevard	I-10 WB on-ramp		Widen SB Crenshaw Blvd to provide a SB right-turn only lane and redesign the VWB off-ramp to reduce congestion and improve intersection operation.	Los Angeles City
Los Angeles	Local Highway	Capacity	Culver Boulevard	Centinela Ave	I-405 Fwy	Improve traffic flow along Culver Blvd between Centinela Ave and I-405 Freeway including providing left-turn lanes at key signalized intersections (including Inglewood Blvd)	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Avenue	Ventura Blvd	Clark St	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Avenue	Saticoy St		Widening to add eastbound and westbound right turn lanes and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Street	Parthenia St		Widening to add dedicated eastbound westbound right turn lane and northbound phasing from left-turn permitted to protected.	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Street	Califa St		Widening to add northbound and westbound right-turn lanes and install new traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Enterprise Street	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	Los Angeles City
Los Angeles	Local Highway	Capacity	Fallbrook Avenue	Victory Blvd		Widening to add westbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Figueroa Street	146th St	Redondo Beach Blvd	Widen Figueroa St to major highway standard from 62 ft to 80 ft to provide three lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Fletcher Street Bridge	LA River		Widen to increase capacity and improve access to I-5 Fwy; add bike lanes and sidewalks	Los Angeles City
Los Angeles	Local Highway	Capacity	Foothill Boulevard	Balboa Blvd		Widen north of Balboa Blvd over culvert and widen west leg of Foothill Blvd at Balboa Blvd. Upgrade traffic signal to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Forest Lawn Drive	near SR-134 Bridge	/LA River	Construct a new bridge with bike path (including equestrian trail) over LA River at LAEC. Re-align the SR-134 freeway on/off ramps at Forest Lawn Dr. to improve flow and capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Fountain Avenue	Sunset Blvd	Western Ave	Widen Fountain Ave to add a left-turn lane at each intersection-ROW acquisition needed	Los Angeles City
Los Angeles	Local Highway	Capacity	Glenoaks Boulevard	Sunland Blvd		Widen Glenoaks Blvd to provide an eastbound right-turn lane	Los Angeles City
Los Angeles	Local Highway	Capacity	Grand Avenue Bridge	Cesar Chavez Ave	Temple St	Widen bridge over US-101 Fwy to improve access to US-101, SR-110, future school and Grand Ave.	Los Angeles City
Los Angeles	Local Highway	Capacity	Grand Avenue Bridge	Over US 101 Fwy		Widen the Existing bridge to provide dual left-turn lane onto the 101 and 110 freeways on-ramps, includes, and add through lane and right-turn lane, and widen sidewalk.	Los Angeles City
Los Angeles	Local Highway	Capacity	Imperial Highway	Sepulveda Blvd	Pershing Dr	Widen to provide continuous three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Irwin Street	Owensmouth Ave	De Soto St	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	La Cienega Boulevard	Arbor Vitae St	111th St	Widen and restripe to accommodate three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	La Tijera Boulevard	Airport Blvd	La Cienega Blvd	Widen and restripe to provide continuous three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Laurel Canyon Boulevard	Mulholland Dr		Widen the west side of Laurel Canyon Blvd south of Mulholland Dr to carry two southbound lanes through the intersection	Los Angeles City
Los Angeles	Local Highway	Capacity	Lincoln Boulevard	Jefferson Blvd	Fiji Way	Partnering with Caltrans & LA County, improve Lincoln Blvd between Jefferson Blvd & Fiji Way including removing the existing bottleneck by replacing/widening the existing bridge to provide an add'l lane in each direction & on-street bike lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Maclay Street	Gladstone Ave		Remove jut-outs on Maclay at Gladstone and install a new traffic signal.	Los Angeles City
Los Angeles	Local Highway	Capacity	Magnolia Boulevard	Cahuenga Blvd	Vineland Ave (north side)	Widen the north side of Magnolia Blvd. to provide an additional lane in the westbound direction.	Los Angeles City

## City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS

County	System	Category	Route Name	Strategic Projects		Project Description	Lead Agency
				From/At	To		
Los Angeles	Local Highway	Capacity	Mason Avenue	Saticoy St		Widening to add Exclusive right-turn lanes for all approaches and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Mission Road	Griffin Ave	Marengo St	Widen Mission Road to provide an additional through lane in each direction, and install new pedestrian signal at Sichel Street	Los Angeles City
Los Angeles	Local Highway	Capacity	Moorpark Avenue	Woodman Ave	Mammoth Ave	Widen Moorpark Ave. to increase capacity and install street lights, curb, and gutter.	Los Angeles City
Los Angeles	Local Highway	Capacity	North Main Street	Albion St		Grade separate North Main Street over the exiting Metrolink and freight tracks; reduces delays for vehicles and transit riders traveling on Main Street	Los Angeles City
Los Angeles	Local Highway	Capacity	North Spring Street	Roundout St	Baker St	Widen N. Spring St. between Roundout St. to Baker St. from 44 ft. to an 80' roadway width and install landscaped medians	Los Angeles City
Los Angeles	Local Highway	Capacity	Olympic Boulevard	Soto St		Improvements to the intersection by increasing the curb return radius of all four corners and Olympic Blvd approaches. ROW required	Los Angeles City
Los Angeles	Local Highway	Capacity	Olympic Boulevard	Alameda St		Widen to improve truck movement (right-of-way required)	Los Angeles City
Los Angeles	Local Highway	Capacity	Olympic Boulevard	Santa Fe Ave		Widening curb return to improve truck movement through the intersection.	Los Angeles City
Los Angeles	Local Highway	Capacity	Owensmouth Avenue	Canyon Creek Dr (Private)		Widening to add southbound and eastbound right-turn lanes, add a northbound left-turn lane, and upgrade traffic signal.	Los Angeles City
Los Angeles	Local Highway	Capacity	Owensmouth Avenue	Saticoy St		Widening to add northbound left-turn and upgrade traffic signal.	Los Angeles City
Los Angeles	Local Highway	Capacity	Oxnard Street	White Oak Ave	Lindley Ave	Widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Oxnard Street	AMC Dwy	De Soto St	(Require additional ROW) to allow through lane in each Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Reseda Boulevard	Burbank Blvd	US-101 Fwy WB ramps	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Riverside Drive	SR-134 Fwy		Widen the bridge to improve the capacity and to add the bike lane	Los Angeles City
Los Angeles	Local Highway	Capacity	Robertson Avenue	National Blvd	/I-10 Fwy Interchange	Reconfigure existing ramps and construct new ramps to improve capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	Roxford Street	Sepulveda Blvd		Realign Roxford St. at Sepulveda Blvd. by widening curb radius to enhance traffic flow.	Los Angeles City
Los Angeles	Local Highway	Capacity	San Fernando Road	Sierra Hwy	Roxford St	Install a center-reversible lane on the Old Road to provide extra capacity during peak hours along an approximately 3 mile segment	Los Angeles City
Los Angeles	Local Highway	Capacity	Santa Fe Avenue	Porter St		Widening curb return to improve truck movement through the intersection.	Los Angeles City
Los Angeles	Local Highway	Capacity	Saticoy Street	Van Nuys Blvd	Woodman Ave	Construct grade separation and extend roadway westerly from Woodman Ave to Van Nuys Blvd	Los Angeles City
Los Angeles	Local Highway	Capacity	Sepulveda Boulevard	National Blvd	Olympic Blvd	Widen to major highway standard and increase number of through lanes from two to three lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Sepulveda Boulevard Corridor	Wilshire Blvd	LAX	Partnering with Culver City & LA County, identify and implement ways of improving traffic flow, carrying capacity, and efficiency in the utilization of the Sepulveda Corridor from Wilshire to LAX	Los Angeles City
Los Angeles	Local Highway	Capacity	Sepulveda Tunnel	Mulholland Bridge		Widen existing tunnel to provide additional traffic lanes and bike lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Sherman Way Avenue	Jordan Ave	De Soto St	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Shoup Avenue	Irwin Ave		Widening to add northbound right turn lane and upgrade traffic signal to include northbound protected left-turn phasing	Los Angeles City

## City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS

Strategic Projects							
County	System	Category	Route Name	From/At	To	Project Description	Lead Agency
Los Angeles	Local Highway	Capacity	Shoup Avenue	Oxnard St		Widening to add northbound right turn lane and upgrade traffic signal to include westbound and northbound protected left-turn phasings	Los Angeles City
Los Angeles	Local Highway	Capacity	Shoup Avenue	Vanowen St		Widening to add eastbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Shoup Avenue	Sherman Way		Widening to add northbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Slauson Avenue	110 Fwy	Alameda St	Design and construction of street improvements and signage for commercial vehicles	Los Angeles City
Los Angeles	Local Highway	Capacity	Topanga Canyon Boulevard	Mulholland Dr		Widening to add a southbound right-turn lane and upgrade traffic signal to include southbound right-turn overlap phase	Los Angeles City
Los Angeles	Local Highway	Capacity	Topanga Canyon Boulevard	Roscoes Bvd		Widening to add northbound left-turn and southbound right-turn lanes and traffic signal upgrade	Los Angeles City
Los Angeles	Local Highway	Capacity	Topanga Canyon Boulevard	Vanowen St	Ventura Blvd	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity. Install new signal at Topanga Canyon Blvd. and Califa St.	Los Angeles City
Los Angeles	Local Highway	Capacity	Vaiel Avenue	Kittridge St		Widening to add eastbound and westbound through lanes and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Valley Boulevard	San Pablo St	Boca Ave	Improve capacity and enhance traffic flow at railroad crossing by widening to add lanes, to improve curb, and to upgrade signal systems and rail road equipment along Valley Blvd.	Los Angeles City
Los Angeles	Local Highway	Capacity	Van Ness Avenue	US-101 Fwy SB off-ramp	Sunset Blvd	Widen both sides of Van Ness Ave. to accommodate one additional southbound lane.	Los Angeles City
Los Angeles	Local Highway	Capacity	Vanalden Avenue	US-101 Fwy EB ramps	Ventura Blvd	Widening to add westbound through lane and upgrade traffic signal to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Vanowen Avenue	Owensmouth Ave	Mason Ave	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Transit	Variel Avenue	Oxnard St		Construction of a 4th Orange Line Station in Warner Center Area	Los Angeles City
Los Angeles	Local Highway	Capacity	Ventura Boulevard	Shoup Ave	US-101 SB ramps	Widen between Shoup Ave and US-101 freeway southbound ramps to provide double left-turn lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Vermont Avenue	Washington Blvd	I-10 Fwy WB off-ramp	Widen 10 ft. of east-side of Vermont Ave to provide left-turn lane	Los Angeles City
Los Angeles	Local Highway	Transit	Victory Boulevard	Owensmouth Ave to Oxnard	Variel Ave to Victory Blvd	Purchase 20 new buses to add to a Local Circulator bus system to operate from Victory to Owensmouth to Oxnard to Variel and back to Victory. Install new bus shelters and/or enhance the existing bus shelters along the route as required	Los Angeles City
Los Angeles	Local Highway	Capacity	Victory Boulevard	Owensmouth Ave	Winnetka Ave	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Western Avenue	Florence Ave	80th St/Manchester Ave	Widen east side of Western Ave. to accommodate left-turn lanes at various intersections within the project limits.	Los Angeles City
Los Angeles	Local Highway	Capacity	Western Avenue	Exposition Blvd		Widen Western Blvd. to add northbound and southbound left-turn lanes at Exposition Blvd.	Los Angeles City
Los Angeles	Local Highway	Capacity	Wilshire Boulevard	San Vicente Blvd	Centinela Ave	Arterial widening to provide an additional lane in each direction.	Los Angeles City
Los Angeles	Local Highway	Capacity	Winnetka Avenue	Vanowen St		Widening to add northbound and southbound right-turn lanes and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Winnetka Avenue	Ventura Blvd		Change westbound right-turn lane to a shared through-right turn lane, add an eastbound left-turn lane, and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Winnetka Avenue	Oxnard St		Widening to add westbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Woodlake Avenue	Victory Blvd		Widening to add northbound shared-through right turn lane and upgrade traffic signal	Los Angeles City

Memo To: Margaret Lin  
From: Greg Adams  
Date: February 14, 2012  
Subject: Comments on the 2012 RTP

Earlier, I attempted to use your interactive website to send these comments but I could not move on to Step 2 for some reason hence I am sending them in this memo format.

To begin, staff is to be congratulated on a thorough analysis and simplified presentation of a complicated strategy.

### Executive Summary

Page 5: Kudos on your recognition of the problems associated with “first mile/last mile” logistics. In and of itself this aspect of a travel decision can be so expensive and burdensome that a well-meaning commuter must choose to drive the entire route despite public transportation availability along most of the route. I suggest you expand on this aspect of the plan. More bike racks on buses may not cut it; local shuttles by cities and park and ride pool vehicles to transportation hubs might help.

Page 7: I may have missed it but “Nominal dollars” in Table 2 (and in many other locations of the document) should be defined early in the report.

### Chapter 1-Vision

Page 12: Increasingly today one hears very inflated claims about job creation resulting from a particular project which are largely unsubstantiated. Perhaps there should be a down-to-earth, simplified discussion of what is to unfold jobwise, not relying on REMI algorithms but a common sense explanation of why 150,000-180,000 jobs per year will be *created* (and presumably sustained) as a result of the RTP implementation. Please avoid what has occurred in the world of green technology, for example. If one were to total all the job creation claims from all the alternatives seeking funding, there would be no unemployment in the United States. The role of lower education levels on the created jobs in the region needs more explanation.

Page 24: More explanation is needed as to the long term trend of declining commute trip carpool rates. It seems counterintuitive especially lately given rising gasoline prices. Does this corroborate with rideshare data reported to the SCAQMD?

Page 25 and 28: Improved fuel efficiency, alternative-fuel vehicle penetration, lack of inflation adjusters—all have contributed to gas tax shortfalls. Passenger vehicles becoming increasingly cleaner have diminished the benefits of reduced vehicle use and congestion management strategies thereby making conformity determinations more difficult. Both of these areas may be worthy of pursuing changes to the federal Clean Air Act or at least the regulations implementing the provisions of the Clean Air Act. This, added to the statement on Page 29 that emissions forecasted from just three sources—ships, trains and

aircraft (“federal sources”) that alone would lead to ozone levels near the federal standard, might be additional ammunition and support for selective changes to the CAA.

## Chapter 2 Transportation Investments

Page 40- Transportation Demand Management: First mile/last mile strategies need more discussion per my remarks on Page 5 above.

Page 41-Congestion Management System: Non-recurring congestion accounts for almost 50 percent of all congestion on our roadway system. One suggestion is for SCAG to strike an agreement with CalTrans prohibiting road repair contracts from proceeding during daylight hours where the work of repair can cause enormous traffic jams. This past Sunday, on the I-10 freeway heading west into Banning, traffic was delayed 3 full hours, backing up all the way to Whitewater , for very minor road repairs that caused two of the four lanes to be cordoned off. Highway Patrol did not appear until an hour and a half into the action which suggests there might be better coordination of their activities from a congestion management standpoint.

Page 43-Corridor System Management Plans: Enhanced incident management must include the above recommendation. The California Highway Patrol (CHP) and CalTrans need to better coordinate. In the case of accidents, the CHP needs to develop expedited procedures and physical screening techniques to minimize the impacts of rubbernecking and the slowdowns that result.

Pages 51 and 53-Passenger and High-Speed Rail: The SCAG planning region will not be connected to the HSR network until 2033, 23 years into this plan. The HSR Authority’s 2009 Business Plan posits that passengers will travel between Los Angeles and San Francisco in less than three hours, for about 80% of comparable airfare. Given that first mile/last mile considerations also exist, why would one choose such a means of travel? Do I presume correctly that the 80% airfare figure is the one-way plane fare in the 2033 timeframe? Given the astronomical cost of the project, might not those resources be better employed on more local and cheaper alternatives such as in-city rapid rail?

Page 71-Regional Clean Freight Corridor System: While truck-only lanes handling 58,000-70,000 trucks per day would be a challenge of the highest degree to implement, non-freeway alignments handling the same traffic flow would be an even greater hurdle, even with 100% ZEVs.

Page 86-The economic Outlook: The inability of existing excise taxes to keep pace with increasing transportation needs and the detrimental effects of increasing fuel economy on traditional revenue sources needs to be the primary focus of a SCAG lobbying effort in Congress at least to escalate the excise tax at the CPI rate.

## Chapter 4- Sustainable Communities Strategy

Page 105- The plan’s goal to seek to change the region from being known worldwide as the “capital of sprawl” results in a “densification” of the existing inner cities, to my way of thinking. Associated with that densification are costly infrastructure changes. Has a cost analysis of this consequence been performed? It is very difficult, as you are well aware, to plan for such effects of densification given the

countering aspects of the recent RDA court decision and the re-distribution of funds to the cities that will result.

#### Page 123-Changing Demographics and Housing Market Demand

The impacts of the recent RDA decision should be addressed in this chapter, even if the results are somewhat speculative. SB 375 combines transportation and housing planning by integrating the Regional Housing Needs Assessment (RHNA) process with the RTP/SCS. How will this nexus be impacted by the RDA decision? Would the example communities that are illustrated on pages 126 and 138, for example, been constructed in the first place without RDA assistance?

#### Chapter 5-Measuring Up

#### Page 173- Table 5.3- Total Employment Impact

Please provide an explanation as to how goods movement, logistics and distribution will be impacted by an expanded Panama Canal and a shift of some traffic to the Gulf Coast ports of the United States.

Thank you for the opportunity to comment. The staff should be congratulated on a thorough and ambitious plan and a job well done.

Ghassan K Roumani

San Marino, Ca

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February 11 , 2012

Ms. Margaret Lin  
SCAG  
818 W. 7th Street. 12th Floor  
Los Angeles, CA 9 0017  
RTP@scag.ca.gov

Re: Southern California Association of Governments 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy December 2011

Thank you for the opportunity to comment on the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. The Plan states as its goal "improving the quality of life for our residents',

***The 2012 RTP/SCS will transform the region, serving as a blueprint for improving quality of life for our residents by provoking more choices for where they will live, work and play and how they will move around around, The 20 12 RT/SCS proposes investing over \$500 billion over the next 25 years to improve the quality of life of the region's residents by enhancing our transportation system.***

While I agree that improving the quality of life for the residents is an admirable goal, the Plan as indicated by the SCS City maps, will denigrate the quality of life for the residents of San Marino. My comments regarding the 2012-2035 RTP are limited to where I live, Oak Knoll Avenue in San Marino, and the adjacent area

While reviewing the Resources> SCS Map Tool from the SCAG web site,

<http://tpscscs.scag.ca.gov/pages/scs-maps-Tool.aspx>, I was shocked to discover that Oak Knoll Avenue in San Marino has been designated a **High quality Transit Corridor**.

The SCAG RTP Plan indicates that

*A HQTA (High Quality Transit Area) is generally a walkable transit village, consistent with the adopted SC5 that has a minimum density of 20 dwelling units per acre and is within a 1/2 mile of a well serviced transit stop, and includes transit corridors with minimum 15 minutes or less service frequency during peak commute hours.*

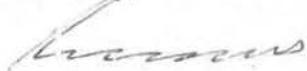
Oak Knoll Avenue in San Marino is a 72 feet narrow, two lane street fronted exclusively by single family homes where children live and play. The homes, built between 1920 and 1950, and the set back is close to the street The posted speed limit is 30 mph, the posted weight limit is three tons, and truck traffic is prohibited. The City of San Marino General Plan, classifies Oak Knoll Avenue as a residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street.

How then, was Oak Knoll Avenue in San Marino designated a HQTC? This question was posed to both the City of San Marino staff and City Council. They were unaware of this designation in the proposed RTP.

As Stephanie Johnson mentioned in her email directed to you dated February 11, 2012 regarding Los Robles the same applies to Oak Knoll Avenue in San Marino.

Oak Knoll Avenue in San Marino does not meet the definition of HQTC.  
Regional traffic should not be directed toward Oak Knoll Avenue, exacerbating the existing cut-through traffic and its resulting negative impacts upon the residents.

Sincerely,



Ghassan Roumani



600 South Main Street, #940, Orange, CA 92868 | P: 714.953.1300 | F: 714.953.1302 | [www.ACCOC.org](http://www.ACCOC.org)

February 13, 2012

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

**Re: Draft 2012 Regional Transportation Plan and Program Environmental Impact Report**

Dear Mr. Ikhata:

The Association of California Cities – Orange County (ACC-OC) is grateful for the opportunity to provide its comments on the Southern California Association of Government’s 2012 Regional Transportation Plan/Sustainable Communities Strategy draft Program Environmental Impact Report. By way of background, the ACC-OC recently joined a coalition of local governments, business community and non-profits to provide its comments and concerns on several key issues where the coalition agreed upon, including:

- Induced growth
- Financial feasibility and responsibility for the implementation of proposed mitigations
- Funding assumptions, especially as it relates to conceptual “mileage-based” user fees
- Mitigation measures that exceed SCAG’s authority and responsibilities for implementation of the RTP.

In supplement to these issues, the ACC-OC respectfully submits a series of additional concerns that we believe should be addressed to ensure the RTP/SCS can meet its objectives without unnecessarily burdening cities across Southern California. These issues include:

- **In general, the RTP infringes upon local control:** The 2012 RTP assumes an inability of local agencies to balance the societal and cultural costs associated with plan objectives and instead requires that they assume the objectives stated in the plan, which may or may not be shared local objectives. Matters such as reducing vehicle miles traveled, eliminating the consumption of fossil fuels in favor of zero or near zero emission vehicles, installing infrastructure necessary to support





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zero emission vehicles (such as charging stations), reducing obesity, environmental justice impacts, anticipating extreme weather and related events, increasing development densities, and the likelihood of the adoption of active transportation methods or the practicality of necessary infrastructure improvements are matters of intense local debate and are not appropriate subjects for regional determination. The RTP should be based less upon behavior management of both the public and public agencies and more upon accurate predictions of population patterns and future transportation requirements.

- **The RTP takes aggressive steps to force cities to adopt costly programs in a time when cities are facing record budget shortfalls and loss of revenues:** Many cities continue to struggle with the loss of revenue into general funds. Additionally, with the loss of redevelopment funds – a staggering \$550 million in Orange County alone – cities face difficult choices on whether or not they can afford to pursue beneficial programs, including blight removal, transportation-oriented development projects, and the greening of cities. While these may be meritorious projects, cities will now be forced to choose between these and core services, including public safety. Mitigation measures, a sample of which is included below, exacerbate the difficulty of these choices.
  - **Urban Growth Boundaries: MM-LU42** – *“Local jurisdictions or agencies can and should establish an urban growth boundary (UGB) with related ordinances or programs to limit suburban sprawl; local jurisdictions or agencies can and should restrict urban development beyond the UGB and streamline entitlement processes within the UGB for consistent projects.”*
  - **Climate Action Plans: MM-GHG9** - *SCAG member cities and the county governments can and should adopt and implement Climate Actions Plans (CAPS, also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions)*
  - **Energy Audits: MM-PS91** - *Local jurisdictions can and should require the performance of energy audits for residential and commercial buildings prior to completion of sale, and that audit results and information about opportunities for energy efficiency improvements be presented to the buyer.*
  - **Parking Management Plans MM-TR96** – *“Local jurisdictions can and should implement a Parking Management Program to discourage private vehicle use...”*

Moreover, these mitigation measures deal mostly with SB 375’s Greenhouse Gas Reduction targets. However, Orange County completed its own SCS (included in the RTP as an appendix) to ensure it can achieve these goals. Therefore, any SB 375 and/or SCS mitigations should also be included as an appendix and for the consideration of each sub-region, including Orange County.





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- **SCAG has significantly over-reached on the implementation language of these (and other) mitigation measures.** The aforementioned measures, as well as numerous others, utilize troublesome “can and should” language in context of the implementation of mitigation measures. This broadly assumes that **a)** cities have the ability to enforce and impose these measures and **2)** that there is funding to ensure the application. In many instances, neither is accurate. This is a fundamental problem with the RTP and must be remedied by replacing “can and should” with “should” or “may.”

Orange County went to great lengths to produce its own SCS that met CARB’s GHG reduction targets. However, the draft RTP/SCS proposed mitigation measures go well beyond what the Orange County-level SCS found to be effective tools to reach these targets. To assume that Orange County cities “can and should” implement these draconian mitigation measures is to discount the extraordinary effort to develop an effective SCS for the unique cities in Orange County.

- **Funding mechanisms for the RTP need much more economic analysis.** Specifically, the identification of more than \$110 billion through the implementation of a “mileage-based” fee is conceptual at best; even an “adjusted gas tax alternative” is not guaranteed. Developing a \$500 billion transportation plan with approximately 20 percent of the budget attached to a concept requires a significant local, regional, state and federal vetting process. We encourage SCAG to include alternative methods of funding should such a mileage-based fee be deemed infeasible.

Thank you again for the opportunity to comment on this important document. We strongly advise SCAG to incorporate these comments into the next draft of the RTP/SCS PEIR and look forward to working with SCAG on its improvement.

Respectfully submitted,

Lacy Kelly  
CEO, ACC-OC

Cc: Will Kempton, CEO, OCTA  
Dave Simpson, Executive Director, OCCOG  
Lucy Dunn, President & CEO, OCBC  
Dennis Wilberg, President, OCCMA



2012 RTP Comments

Walter Siembab, Siembab Corporation

February 14, 2012

Comments: Telecommuting in the 2012 RTP

Despite its relative low capital cost and high cost-effectiveness, telecommuting remains in 2012 a marginal strategy for reducing GHG emissions and congestion.

The 2012 RTP could lay out the path by which telecommuting could reach its potential, particularly in an RTP with such a gigantic revenue shortfall. But it doesn't.

Table 4.5 of the SCS lists only one specific telecommuting action/strategy, and it will do nothing to change the marginal role of telecommuting over the next 4 years.

"Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options."

The discussion of Telecommuting/Work-at-Home in the TDM Appendix is equally unhelpful, focusing on barriers to telecommuting and mentioning a few policies to overcome those barriers, none innovative nor likely to make a difference.

One of the basic problems with telecommuting in the 2012 RTP (and previous RTPs) is that the strategy is treated as a member of the TDM family of policies.

However, among all the TDM options, only telecommuting mimics land use. Telecommuting, like other network applications associated with "distributed organizations" (such as tele-medicine, e-retail, distance education, etc), can affect the location of destinations. For example, portions of auto-oriented employment centers can be strategically re-located into walking neighborhoods. In other words, telecommuting can impact the spatial distribution of functionality. It is really a way of implementing "location efficiency."

Beyond that conceptual revision, there are a number of strategic options that should be added to the 2012 RTP.

Goal should be for every employee except for those involving physical materials-handling or other hands-on activity (like truck driving) to expect some to be offered some telecommuting option; with every employer expected to authorize an alternative work site within 4 miles of every eligible employee's home. This is consistent with

existing travel patterns to other destinations; is compatible with short-range electric vehicles; and will reinforce the “neighborhood oriented development” (NOD) strategy.

Four initiatives are required to reach that goal.

### 1. Regional Telework Facilitator

Public agencies trying to encourage the telework strategy tend to do so through corporate demonstration programs. The AQMD recently funded such a program which is in process today. Demonstration programs have been repeatedly found to produce short term but not long term results. When the funding goes away, the active teleworkers begin to decline back to pre-demonstration levels.

Establishing the institutional infrastructure that will support telework in the long run is the most effective step that could be taken. Similar to the old “Commuter-Computer” for ride sharing, this regional organization would market the telework option (in all of its varieties – home based, satellite, shared work center, network access center, etc.) to employers. Other tasks include maintaining best practices, offering first line technical assistance, and making referrals to implementation consultants.

A five year public commitment would be best, giving the organization the opportunity to develop a business plan in order to continue operating with a minimal public subsidy. Technology firms with products used in telework are good candidates to serve as private partners.

### 2. Opinion Leaders

Elected officials, public sector executives plus leading private CEOs committing their own organizations to an aggressive telework program is also essential. The organizations and their commitments should have a high profile. The practice should also include the full range of distributed applications such as distance education, telemedicine, e-retail, etc. The Regional Telework Facilitator should organize and maintain this public-private leadership council.

### 3. Telework Facilities Exchange

The Telework Facilities Exchange (TFX) was a work-station sharing program for government employees that I designed and implement in the mid-1990s, sponsored by the League of California Cities and funded by the SCAQMD. Government employees (city, county, state, federal) were matched to a vacant work station in another government building near their residence. It was, at the time, the largest multi-

jurisdictional telework program in the nation. The planning and advocacy function of the project was the prototype Regional Telework Facilitator.

#### 4. Network Access Centers

Network Access Centers (NAC) are a new type of public facility that will contribute to transportation access, economic development, and education. A NAC is a multi-function, multi-user facility that provides technical assistance, fast network connections, information technology, work stations, meeting space, and special programs that include distance education classes, tele-medicine consultations and so forth. A NAC is essentially a programmable building whose functionality can be changed hour by hour, day by day to satisfy community need for travel.

NACs should be added to transit stops (especially multi-mobility hubs), public schools, public libraries, neighborhood centers, and downtown districts.

The Blue Line TeleVillage in Compton, funded by Metro in the late 1990s, established proof of concept in LA County. Yet it was not replicated.

With institutional infrastructure like the Regional Telework Facilitator, physical infrastructure like NACs, and programs such as the TFX, telework will become a significant employment option throughout the region.

MAYOR  
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P. David Benavides  
Carlos Bustamante  
Michele Martinez  
Vincent F. Sarmiento  
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February 14, 2012

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments (SCAG)  
818 West Seventeenth Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-2435

**RE: Comment on the Draft 2012 Regional Transportation Plan and Program  
Environmental Impact Report (EIR)**

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) draft 2012 Regional Transportation Plan (RTP) and related Program Environmental Impact Report (EIR). We would like to also acknowledge the significant effort made by SCAG, in cooperation with the Orange County Council of Governments (OCCOG), in crafting the “first” SB 375 Sustainability Communities Strategy (SCS) for incorporation into the 2012 Regional Transportation Plan.

In review of the draft 2012 SCAG Regional Transportation Plan and Program EIR, the following are three key areas we would like bring to your attention:

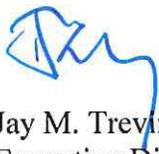
1. The growth forecast numbers included the draft 2012 Regional Transportation Plan should allow for reasonable market flexibility. Thus, it is recommended that the growth projections be incorporated and adopted at a County level. Adoption of population, employment and housing growth projection at any smaller geography could introduce unnecessary and unintended challenges for cities and the development community to make reasonable adjustments to land use approvals; and potential inconsistency with the adopted Regional Transportation Plan.
2. The Orange County Projections (OCP) are developed every three to four years in cooperation with each individual jurisdictions in Orange County, to reflect the anticipated growth for our communities. We respectfully request that the Regional Transportation Plan be refined to include the latest “OCP 2010-Modified” version that incorporates the 2010 Census and more recent State employment data.

Mr. Hasan Ikhata  
February 14, 2012  
Page 2

3. Several mitigation measures within the RTP Program Environmental Impact Report inappropriately uses the terms “will and shall” in describing the measures. For example, Mitigation Measure 76 (M-TR76) states, “Street standards will include provisions for bicycle parking within the public right of way.” Given local policies and ordinances to support them are not in place at this time, stating “will include” in these mitigation measures in the Program EIR are not appropriate. It is suggested that this language in the measures be replaced with “can and should”.

The City of Santa Ana appreciates the significant resources and collaborative effort required to develop the 2012 SCAG Regional Transportation Plan; particularly with the SB 375 requirement to incorporate a Sustainability Communities Strategy to integrate land use and transportation planning to promote sustainable communities. We appreciate the opportunity to comment on this landmark regional planning document. Should you needs any clarification regarding our comments, please feel free to contact Associate Planner Melanie McCann at 714.667.2746 [mmccann@santa-ana.org](mailto:mmccann@santa-ana.org).

Sincerely,



Jay M. Trevino  
Executive Director  
Planning and Building Agency

MGM/ GHG/2012RTP/LetterFeb14.2012

cc: Raul Godinez, PWA Executive Director  
David Simpson, Orange County Council of Governments Director



**Ronald Bates, Ph. D.**  
City Manager

# City of Pico Rivera

## OFFICE OF THE CITY MANAGER

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### City Council

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*Mayor*

Gustavo V. Camacho

*Mayor Pro Tem*

David W. Armenta

*Councilmember*

Gregory Salcido

*Councilmember*

Brent A. Tercero

*Councilmember*

February 14, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

*Email: [RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)*

SUBJECT: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS' 2012-2035  
DRAFT REGIONAL TRANSPORTATION PLAN/SUSTAINABLE  
COMMUNITIES STRATEGY

Dear Ms. Lin:

The City of Pico Rivera appreciates the opportunity to provide comments on the 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Associated Draft Environmental Impact Report (PEIR). The City of Pico Rivera respectfully submits comments on the proposals for the East-West Freight Corridor Program and the California High Speed Rail Program

### **East-West Freight Corridor Program**

The City supports the proposal for the East-West Freight Corridor Program. The City agrees the Southern California regional freeway system represents one of the highest volume goods movement corridors in the United States and is of major importance to the distribution of consumer goods. We understand major freeways such as Interstate 605 and State Route 60, are impacted by high volumes of truck traffic and truck volumes that will increase through 2035 by 260% or more. For this reason, the City supports the East-West Freight Corridor Program as the solution to address the goods movement in the region.

We recognize that the RTP/SCS identifies and recommends a corridor concept that would connect to the north end of the I-710 freight corridor, roughly parallel the Union Pacific Railroad (Los Angeles Subdivision) before finally following a route adjacent to SR-60 just east of SR-57. This grade-separated concept considers the use of the Union Pacific Railroad Corridor (UPRR Corridor), between I-710 and I-605, through the City of Pico Rivera.

The RTP/SCS further states that the potential use of two non-roadway routes provides an opportunity to move the facility away from neighborhoods and closer to the industrial activities that it would serve. This could not be further from the truth, especially when considering the existing land uses adjacent to the UPRR Corridor within the City of Pico Rivera. Approximately 80% of the existing land use along said Corridor is residential. The statement that this alignment provides an opportunity to move the facility away from neighborhoods is erroneous as it relates to the City of Pico Rivera.

The proposed dedicated truck lanes, forecasted to carry from 58,000 to 70,000 trucks per day, will result in the rerouting of truck traffic from major freeways through the City of Pico Rivera. In effect, the program would build a new freeway through Pico Rivera dedicated to truck traffic (truck dedicated freeway).

The City of Pico Rivera opposes any corridor alignment that includes the segment of the UPRR Corridor between the 710 Freeway and the 605 Freeway. This proposal splits the City in half, requires significant residential, industrial, and commercial property acquisition, and has aesthetic impacts unacceptable to the City. This proposal is unacceptable to the city and we oppose it.

The City respectfully requests that potential routes for the East-West Freight Corridor be limited to freeway routes only, and the non freeway routes not be further considered. The subject UPRR Corridor segment can be supplanted with the segment of the State Route 60, between the Interstate 710 and the Interstate 605. SCAG should effectively evaluate the connection between the two freeways to make this option feasible.

As stated in the enclosed City Council Resolution approved on October 25, 2011, the City of Pico Rivera supports the East-West Freight Corridor Program and supports alternative regional goods movement plans that equitably distribute truck traffic between the Interstate 710 and Interstate 15 through the expansions of the existing freeway system. However, for the reasons stated above, the City of Pico Rivera opposes any SCAG proposal for dedicated truck lanes along the Union Pacific Railroad Corridor, in the City of Pico Rivera.

### **California High Speed Rail**

The RTP/SCS includes options for high speed rail. The City is concerned about the feasibility of such a project in California. We understand that discussions are ongoing among SCAG, the County Transportation Commissions, and the California High Speed Rail Authority regarding levels of available funding for rail infrastructure improvements within the SCAG region. We look forward to further details about the specific investments that will be made in Southern California's rail infrastructure under the RTP/SCS, particularly those that affect the City of Pico Rivera.

At this time, the RTP/SCS proposes three Passenger Rail strategies that will provide additional travel options for long-distance travel within the region and to neighboring regions. The City understands these improvements to be to the Los Angeles-San Diego (LOSSAN) Corridor,

improvements to the existing Metrolink system, and the implementation of Phase I of the California High-Speed Train project. The City would support such improvements only if to enhance the existing rail system through Pico Rivera, and not add supplementary rail lines within new corridors that would require significant residential/industrial/commercial property acquisition.

### **Goldline Eastside Transit Corridor Phase II**

The RTP/SCS estimates that the Goldline Eastside Transit Corridor will be completed by 2035. However, the need for mass transit in the eastside area is greatly underestimated and should be included as a high priority project. The Goldline Eastside Transit Corridor was also included as a project in the regional SCS as it will greatly help to reduce the effects of greenhouse gases. As such, the City of Pico Rivera requests that the Goldline Eastside Transit Corridor be a high priority project both in the RTP/SCS and in the biennial 2011 Federal Transportation Improvement (FTIP) update.

### **Financial Plan**

Table 3.3, *New Revenue Sources and Innovative Financing Strategies* of the RTP/SCS Financial Plan lists Mileage-Based User Fee as a replacement to the gasoline tax. This is a new fee that may affect lower-income residents within the Gateway Council of Governments region. Please advise how the fees would be implemented and how they may affect lower income residents.

Thank you for your attention to this matter. Should you have any questions, please contact Art Cervantes, Director of Public Works/City Engineer, at (562) 801-4225.

Respectfully,



Ronald Bates, Ph.D.  
City Manager

RRB:AC:RG:lg

cc: Director of Public Works/City Engineer  
Assistant City Engineer

Enclosure (Resolution No. 6646, adopted 10/25/11)

**RESOLUTION NO. 6646**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PICO RIVERA, CALIFORNIA - SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS - EAST-WEST FREIGHT CORRIDOR PROGRAM**

**WHEREAS**, the Southern California regional freeway system represents one of the highest volume goods movement corridors in the United States and is of major importance to the distribution of consumer goods and in facilitating international trade; and

**WHEREAS**, an important part of the movement of goods within the region is accomplished through a complex system of transportation infrastructure; and

**WHEREAS**, the City Council of the City of Pico Rivera 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 Pico Rivera; and

**WHEREAS**, the Southern California Association of Governments (SCAG) prepared an analysis to evaluate East-West freight corridor alignment alternatives between the Interstate 710 and west to the Interstate 15. Alignment alternatives were evaluated based on proximity to current and future freight markets, feasibility and right-of-way constraints, and corridor operational characteristics which considers truck traffic volumes and frequency of truck-involved accidents; and

**WHEREAS**, SCAG is proposing certain conceptual alignments that involve installing dedicated truck lanes along the Union Pacific Railroad (UPRR) Corridor, between the Interstate 710 and the Interstate 605, on at-grade or elevated structures. Such alignments involving the UPRR Corridor severely impact the City of Pico Rivera and require significant industrial/commercial and residential property acquisition; and

**WHEREAS**, the proposed UPRR alignment alternatives are forecasted to carry over 57,000 trucks per day. Any alignment involving the UPRR Corridor in the City of Pico Rivera would result in the rerouting of truck traffic from major freeways thru the City of Pico Rivera thereby severely impacting the City; and

**WHEREAS**, there is currently insufficient engineering and environmental review of any alignment involving the UPRR corridor to warrant the inclusion in any long-term transportation planning document, including the 2012 Regional Transportation Plan (RTP).

**NOW, THEREFORE, BE IT RESOLVED** that the Pico Rivera City Council does hereby find and determine as follows:

**Section 1.** That the City of Pico Rivera supports the East-West Freight Corridor Program.

**Section 2.** That the City of Pico Rivera supports alternative regional goods movement plans that equitably distribute truck traffic between the Interstate 710 and Interstate 15 through the expansions of the existing freeway system.

**Section 3.** That the City of Pico Rivera opposes any SCAG proposal for dedicated truck lanes along the Union Pacific Railroad Corridor.

**Section 4.** The City Clerk shall attest and certify to the passage and adoption of this Resolution and it shall become effective immediately upon its approval, with a certified copy of this Resolution being forwarded to the Southern California Association of Governments, Los Angeles County Board of Supervisors.

APPROVED AND ADOPTED this 25 day of October, 2011.

  
David W. Armenta, Mayor

ATTEST:

APPROVED AS TO FORM:

  
Daryl Betancur, City Clerk

  
Arnold M. Alvarez-Glasman, City Attorney

AYES: Camacho, Contreras Rapisarda, Salcido, Archuleta, Armenta  
NOES: None  
ABSENT: None  
ABSTAIN: None



February 14, 2012

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

RE: Comments on Draft 2012-2035 Regional Transportation Plan – Sustainable Communities Strategy & the Draft Program Environmental Impact Report

Dear Mrs. Lin:

The Imperial County Air Pollution Control District (Air District) has finalized the review of the Draft 2012-2035 Regional Transportation Plan (RTP) – Sustainable Communities Strategy and its Draft Program Environmental Impact Report (Draft PEIR) and is here by providing its comments.

RTP

**Section: Executive Summary**

- The list of transportation investment projects found in page 5 and 6, calls for many beneficial projects within the SCAG region which would ultimately reduce VMT, traffic congestion and vehicle emissions. On top of the priority list and one of the most expensive projects is the passenger high speed rail system which is schedule to provide services to most of the SCAG region with the exception of Imperial County. As indicated in Table 1.7 found on page 28 of the RTP, the Imperial County is currently classified non-attainment for 2008 8-hour Ozone standard, as well as non-attainment for the PM10 and PM2.5 standards which is why it is very important and crucial that projects such as the high speed rail system are built and tied into the Imperial County to alleviate the same issues other SCAG regions are having and expect to have in future years. As it stands, the Air District will not benefit from the emission reductions a high speed rail system can provide. For this reason, the Air District would like to request a cost-feasibility analysis and/or a detailed explanation which demonstrates why tying a high speeds rail system to the Imperial County is not beneficial.
- The current financial plan found on page 7 calls for an estimated \$110.3 billion revenue source from a proposed mileage-based user fee beginning in 2025. If this revenue source is ultimately approved and implemented, Imperial County residents will be at an

enormous disadvantage and end up paying more into this funding source due to the county's geographical location and lack of transportation resources available in the area (currently high-speed rail not proposed). Even though the Imperial County's population has continued to grow at a fast rate during the last couple of years (page 17), it still continues to heavily rely on goods and services that are mainly provided in metropolitan areas such as San Diego, Riverside and L.A. Counties. As mentioned in the first comment, the Air District is in desperate need of transportation improvements that will not only allow easier, faster and safer services to other SCAG regions but that it will also reduce air emissions in the Imperial County region.

## **Section: 02 – Transportation Investments**

- The Air Quality section on page 79 provides several measures that are necessary to address air emissions necessary to achieve RTP goals. One of the measures is to have “ARB measures that set new on-road and off-road engine standards and accelerate turnover of higher emitting engines from the in-use fleet” among others. It is important for SCAG to continue working with the California Air Resources Board (CARB) and to discuss these types of measures in a consistent basis to ensure new engine standards and the turnover of higher emitting engines will be feasible for both the private and public sector in the upcoming years. In 2008, CARB adopted the Truck and Bus regulation which requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Heavier trucks must be retrofitted with PM filters beginning January 1, 2012, and older trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. Ultimately, the Air District would like to know if the emission reductions found on Table 3.2: Criteria Pollutant Emission By County – Existing Conditions (2012) VS Plan (2035) have been approved by CARB and will be included in their emissions inventory.

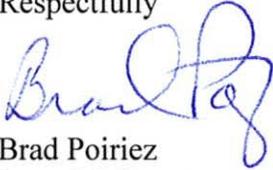
### DPEIR

- On Page 3.2-12, it is stated that the entire portion of the Imperial County is maintenance for 8 hour ozone. This statement is incorrect, the Imperial County is in attainment of the 1997 8-hour ozone standard however it is in non-attainment of the 2008 8-hour ozone standard.

As stated on the DEIR, it is important to note that future projects within the Imperial County geographical area will be required to comply with local rules and regulations to minimize construction and operational emissions. The Imperial County *CEQA Air Quality Handbook* provides guidelines which assist in identifying when an air quality analysis is necessary, the type of analysis that should be performed, the level of significance of the impacts predicted by the analysis, and the mitigation measures needed to eliminate or reduce the overall air quality impacts. The CEQA Handbook also provides emission thresholds for both project construction and operations which assist in determining whether the project may have a significant air quality impact.

In conclusion, the Air District looks forward to working with SCAG and other regions to ensure the current and proposed transportation plans for our region not only improves mobility, the economy and provides sustainability but that it also commits to reducing emissions from transportation sources as well as construction sources ultimately improving air quality in the entire region.

Respectfully



Brad Poiriez  
Imperial County, APCO

CC: Mark Baza, Executive Director, ICTC  
APCD Board of Directors



February 14, 2012

President Pam O'Connor  
Board of Directors  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Re: Draft 2012 – 2035 Regional Transportation Plan/Sustainable Communities Strategy

**Dear President Pam O'Connor and Honorable Members of the SCAG Regional Council:**

On behalf of the Los Angeles chapter of the American Institute of Architects (AIA|LA), I am writing to express our thoughts on the draft 2012 – 2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP). With great respect for the process to draft such a comprehensive plan, we commend you on the progress made so far.

As AIA|LA supports smart growth policies that facilitate infill development projects and concentrate our investments in areas that sustain the vibrancy of the urban core, we encourage you to adopt Alternative 3 (Envision 2 Alternative) of the draft plan. This option will foster smart growth land use and housing patterns to achieve superior environmental results in air quality, aesthetics, open space and farmland preservation, water conservation, greenhouse gas emissions reductions, mobility, and land use.

Transit projects and active transportation investments should take precedent over highway expansion projects. Infill development and transit-first policies are natural allies of each other. Accelerating transit infrastructure and associated joint-use, mixed-income development also helps our region achieve its social, economic and cultural development goals.

AIA|LA is concerned that the current draft plan provides for a disproportionate share of funds towards highway capacity improvement that will facilitate greenfield development. The consequence of additional freeway lanes will be more VMT and more sprawl, with the associated air quality and infrastructure maintenance requirements. Environmentally and economically, facilitating more compact urban development and design conserves our natural resources and our tax dollars. In short, adopting the Envision 2 Alternative Plan will help S.C.A.G. emphasize its leadership role to shape emerging land-use and transportation plans.

Moving forward we invite the S.C.A.G. Board of Directors and staff to work with AIA|LA to shape an environmentally healthy and economically compelling vision for the future of Southern California.

Very truly yours,

Will Wright  
Director, Government & Public Affairs

Sponsors:

California State  
University, Fullerton

County of Orange

Municipal Water  
District of  
Orange County

Orange County  
Council of  
Governments

Orange County  
Sanitation District

Orange County  
Transportation  
Authority

Orange County  
Water District

Southern California  
Association of  
Governments

Transportation  
Corridor Agencies

Contributing Partner:

Orange County  
Local Agency  
Formation  
Commission

February 14, 2012

Ms. Margaret Lin  
Southern California Association of Governments  
818 West Seventh Street, 12th Floor  
Los Angeles, CA 90017  
RTP@scag.ca.gov/ lin@scag.ca.gov

**SUBJECT: COMMENTS ON THE DRAFT 2012 REGIONAL TRANSPORTATION PLAN, APPENDICES, AND GROWTH FORECAST DATASETS**

Dear Ms. Lin:

The Center for Demographic Research at Cal State Fullerton has reviewed the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategies, its associated appendices, and the growth forecast datasets. We greatly appreciate the opportunity to do so and for all of the work SCAG staff has done to produce these reports and work with local agencies during the development process.

First, we would like to express support of recommendations by the Orange County Council of Governments, the Orange County Transportation Authority, the Transportation Corridor Agencies, and other Orange County agencies whose comments also request the inclusion of the updated Orange County growth forecast, the 2010 Orange County Projections Modified, in the RTP/SCS plan and alternatives.

Our comments are grouped as follows:

1. Incorporate the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors, into all RTP/SCS/PEIR documents, appendices, tables, maps, narrative, modeling runs, PEIR Alternatives (including Alternate C/3/Envision 2 referencing the Orange County growth forecasts) consistent with the subregional delegation MOU between OCCOG, OCTA and SCAG.
  2. SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, and not at a smaller level of geography such as city, census tract, or traffic analysis level.
  3. Other Comments on the Draft 2012 RTP documents in Tables 1, 2, and 3.
1. Incorporate the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors, into all documents, tables, maps, narrative, modeling runs, and PEIR Alternatives (including Alternate C/3/Envision 2) referencing the Orange County growth forecasts consistent with the subregional delegation MOU between OCCOG, OCTA and SCAG.

On January 26, 2012, the update to the OCP-2010 dataset, known as OCP-2010 Modified, was officially approved by the OCCOG Board of Directors and is a data amendment to the Orange County Sustainable Communities Strategy. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this is the formal notice of the update which should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.

2. SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, and not at a smaller level of geography such as city, census tract, or traffic analysis level.

The 2012 growth projections identify population, housing and employment data for the six-county SCAG region, from 2008 (Existing) to 2020 and 2035. These growth projections represent the best available information from local jurisdictions, the business community and landowners. However, as time passes, what is feasible for any given project can change. The triggers for change to adopted growth projections can range from factors such as market conditions, new information or data, infrastructure availability, changes in funding availability (such as the dissolution of redevelopment agencies statewide), and changes to jurisdictional boundaries resulting from future annexations and incorporations of previously-designated unincorporated territory. SCAG should continue to adopt the 2012 growth projections at a countywide level, consistent with past approvals of Regional Transportation plan growth forecasts. A county level of geography accommodates internal adjustments to changing conditions as described above, without compromising the integrity of the overall growth projections. However, approving the growth projections at any lower level of geography, such as at the city level, would be challenged with continual revisions and shifts to the total number of housing, population and employment within a city, among cities, and between cities and counties as a result of the factors described above. Adoption of the data at a level lower than the county would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the RHNA allocations must be consistent with the RTP/SCS; state law does not require that they be identical. The RTP/SCS can be adopted at the county level and the RHNA process may proceed independently until it is completed after the appeals, trades, and transfers are completed. The RHNA allocations that were derived from the growth forecast can still be determined to be consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.

3. Other Comments on the Draft 2012 RTP documents in Tables 1, 2, and 3:

**Table 1. 2012 RTP/SCS COMMENTS**

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	all	<i>All chapter headings should include the Chapter number on each page for ease of reference.</i>
2	Clarification	1, left column	<i>“The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to <u>comply with SB 375</u>, <del>both</del> improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. As</i>
3	Clarification	4, right column	<i>“This region needs a long-term, sustainable funding plan that <u>ensures the region receives its fair share of funding</u>, supports an efficient and effective transportation system that grows the economy, provides mobility choices, and improves our quality of life.”</i>
4	Clarification	page 7- Table 2 and page 95- Table 3.3	<i>Is additional \$0.15 gas tax the sum total of both state and federal taxes or \$0.15 each?</i>
5	Clarification	12, right column	<i>“It also demonstrates how we can transition from things we know to be unsustainable <u>over the long term and beyond the term of this RTP</u>—such as reliance on fossil fuels—to new technologies for the future.”</i>

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	30, 31, 73  30, right column  31, right column  73, right column	<p>AB 32 is global warming solutions act. SB 375 was determined to be stand-alone legislation. RTP document is not forum to address global climate change and references are unnecessary, off topic, and distract from RTP goal and purpose. “Global warming” and “global climate change” / “climate change” are not interchangeable phrases. References should be removed or, where appropriate, language should be changed to “global warming”.</p> <p>“The RTP/SCS includes the following actions to address energy uncertainty <del>and reduce the region’s contribution to global climate change.</del>”</p> <p>“Adaptation <del>Climate change</del> <u>global warming</u> mitigation means reducing or sequestering greenhouse gases, whereas adaptation is preparing for known impacts of <del>climate change</del> <u>global warming</u>. Over the coming century, <del>some climate change</del> studies project that Southern California will be expected to manage extremes of precipitation and temperature, increased storm frequency and intensity, and sea-level rise. These climate changes <del>will</del> <u>would</u> impact streamflow, flooding, water supply, sea level, and soil water content. These impacts <del>will</del> <u>would</u> affect agriculture, stormwater, wastewater treatment, wildfire risk, roads, forest health, and biodiversity. These impacts <del>will</del> <u>would</u> also have consequences for public health, economic livelihoods, the financial sector, the insurance industry, individual comfort, and recreation. In practice, these impacts <del>will</del> <u>would</u> mean coping with...”</p> <p>“Goods movement is also a major source of greenhouse gas (GHG) emissions that contribute to global <del>climate change</del> <u>warming.</u>”</p>
7	Clarification	40, left column	“Strategic investments, <del>put forth by the private sector,</del> that would remove barriers associated with telecommuting are expected...”
8	Correction	page 42- Table 2.2	241 toll road completion year is <u>2030</u>
9	Define in text and add to glossary	50, left column	“scrip”
10	Clarification	54, right column	“Express/HO T Lane Network Despite our concerted effort to reduce traffic congestion through years of infrastructure investment, the region’s system demands continue to exceed available capacity <u>during peak periods.</u> ”



#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
13	Clarification	page 95- Table 3.3	<p><del>“Mileage-based user fees would be implemented to replace gas tax and augment—estimated at about \$0.05 (2011\$) per mile and indexed to maintain purchasing power starting 2025.”</del></p> <p>Suggested language is from page 31 of Growth Forecast Appendix:  <u>Current gasoline tax, estimated at about \$0.05 (2011\$) per mile will increase through 2025, then in 2026 it would be replaced with a mileage-based user fee indexed to maintain purchasing power</u></p>
14	Clarification	105, right column	<p><del>“While the region was once known worldwide as the “capital of sprawl,” the region today is projecting growth on only a small fraction of the <u>has little</u> raw land available in the region <u>left to accommodate additional growth.</u>”</del></p>
15	Clarification	106, last paragraph	<p>Please revise the text in the last paragraph on page 106 to state:</p> <p><u>“These subregional SCS documents are incorporated into the regional SCS and represent the SCS for each of these subregions.”</u></p>
16	Clarification	110, right column	<p><del>“Municipal water and sewer systems, for example, ensure clean water. At the same time, <u>concrete stormwater runoff channels harm water quality and sprawl eats into open space</u> as areas become more urbanized and the percentage of impervious surface is increased, the hydrologic regime is dramatically altered. Drainage conveyances that once were natural and riparian are required to be engineered as hardened flood control channels to provide adequate protection of private property and public infrastructure from the increased frequency, duration, peak flow, and overall volume of stormwater runoff. With this armoring of once natural channels, water quality benefits from biofiltration are lost along with opportunities for infiltration and evapotranspiration, which can lead to hydromodification downstream in sections which are not yet engineered and hardened. Many strategies...”</del></p>
17	Add to glossary	127, right column	<p>“Gentrification”</p>
18	Please clarify	128, left column	<p>“Thus, this adjustment allowed the land use pattern to conform more closely to local <del>expectations</del> <u>general plans</u>, while reducing the amount of vehicle miles traveled.”</p> <p><i>Whose/What are “local expectations?”</i></p>
19	Revise language to clarify	149, right column	<p>Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.</p> <p><del>“The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders <u>may use or consider while preparing specific projects which would help can and should undertake in order</u> to successfully implement the SCS.”</del></p>

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Revise language to clarify	153, right column	<p>“Evaluation and Revision SCAG will also track its <u>own</u> progress in implementing its RTP/SCS strategies in conjunction with the preparation and adoption of its Overall Work Program and Annual Budget.”</p> <p><i>Clarify if “its progress” is SCAG’s progress or the region’s progress.</i></p>
21	Add to glossary	166, right column	“Greenfield”
22	Correct language	193, right column	RC adopted revised PPP in January 2012
23	Revise language to clarify	194, right column	“In addition to these targeted outreach efforts, all regular and special meetings of the RTP task forces, the Transportation Committee (TC), the CEHD, the EEC, and the SCAG Regional Council are publicly noticed and ...”
24	Please clarify	203, right column	<p>“...including Los Angeles Ontario Airport, the March Inland Port...”</p> <p><i>Should LAX and Ontario airports be named separately?</i></p>
25	Add to glossary	205	“Active transportation”

**Table 1. GROWTH FORECAST APPENDIX COMMENTS**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Update growth forecast numbers	23, Table 13	<p>In December 2011, Orange County provided SCAG with the revised growth forecast dataset, OCP-2010 Modified, per the OC SCS MOU (official OCCOG Board action 1/26/2012).</p> <p><i>Please incorporate OCP-2010 Modified into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.</i></p>

**Table 3. SCS BACKGROUND DOCUMENTATION APPENDIX COMMENTS**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Please define	53, right column	<p>Housing Options and Mix:</p> <p><i>Define Larger-lot single family in text</i></p>
2	Clarification	71-74, 80-83	<p>Alternatives A, B, C</p> <p>Names of Alternatives differ than those listed in the PEIR on pages ES-3 and 1-4.</p> <p><i>Please be consistent with naming protocol for alternatives between two/all documents.</i></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	71, right column	<p>“Plan Alternative (B) ... The alternative maintains city-level forecast control totals for both households and jobs, however, within city boundaries shifts are made to focus a much larger share of future growth in a more compact way around HQTAs, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements</u>. Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family <del>housing</del> <u>housing</u>.”</p>
4	Please define	71, right column	<p>Plan Alternative (B)  <i>Define small lot single family in text</i></p>
5	Clarification	71, right column	<p>Plan Alternative (C) “As a result very suburban communities may experience no new <u>housing or employment</u> growth, while some urban areas with very good access to regional transit may experience significant increases in <u>housing or employment</u> growth.”</p>
6	Clarification	72, left column	<p>“While each alternative is distinctive, a number of parameters remained constant across each alternative: the regional RTP/SCS forecast total for <u>population, households and jobs</u>;...”  “Detailed forecast: the detailed distribution of <u>population, households, and jobs</u> across the region...”</p>
7	Clarification	72, left column	<p><i>What does it mean that TAZ boundaries include city boundaries?</i></p>
8	Clarification	72, Table D1	<p>Alternatives A &amp; B: “Controlled to TAZ-based RTP/SCS Forecast for 2020; Controlled to city-level RTP/SCS Forecast for 2020-2035, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements</u>.”  Add statement to table notes: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements</u>.</p>
9	Clarification	74, Table D2	<p>Alternatives A &amp; B: Add statement: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements</u>.</p>
10	Clarification	75, right column	<p>“Development Types The alternatives are built on, and provides data at, the level of the TAZ, which includes housing units and employment.”  <i>Please clarify if TAZ is Tier 1, Tier 2, or both.</i></p>
11	Clarification	79, right column	<p>“Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be <u>respected unchanged</u> and integrated into the alternatives (with possible revisions for Alternative C only).”</p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	80	Alternative A Add statement: <u>Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u>
13	Clarification	81	Alternative B Add statement: <u>Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u>
14	Clarification	115, left column	Transit Zoning Code Santa Ana 2011 <i>Is this a duplicate of the 2010 Santa Ana project?</i>

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

Sincerely,



Deborah S. Diep  
CDR Director

CC: CDR Management Oversight Committee  
CDR Technical Advisory Committee  
Hasan Ikhata, SCAG  
Scott Martin, CDR



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

Arthur T. Leahy  
Chief Executive Officer  
213.922.6888 Tel  
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metro.net

February 14, 2012

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 2012 Regional Transportation Plan (RTP/SCS).

We would also like to compliment SCAG on the immense stakeholder outreach process that was undertaken to develop the RTP/SCS in conjunction with the Sustainable Communities Strategy (SCS), in order to develop this draft RTP/SCS. We find the document to be well-written in identifying many of the key challenges our region faces.

Attached for your consideration are our comments on the Draft 2012 RTP/SCS.

Again, SCAG has made an exceptional document from a challenging set of requirements, and we commend you.

Sincerely,

for Arthur T. Leahy  
Chief Executive Officer

Attachments

## Comments on Draft 2012 Regional Transportation Plan

- We commend SCAG for the significant and unprecedented outreach to MTA, sub-regional agencies, and the public in the development of the Draft 2012 RTP/SCS. We also acknowledge the extensive and dedicated effort on the part of SCAG to craft a Southern California approach to the new SCS requirements of SB 375. We are pleased that the Draft 2012 RTP/SCS has been able to meet both the air quality conformity requirements of the federal Clean Air Act, and green house gas emission (GHGe) reduction requirements necessary to comply with SB 375.
- We appreciate the working relationship between SCAG and MTA staff necessary to integrate our 2009 Long Range Transportation Plan (LRTP) projects, programs, and financial assumptions into the Draft 2012 RTP. It appears that the Draft 2012 RTP includes all projects and programs funded by MTA in the 2009 LRTP. We note that SCAG has identified a number of projects and programs that are beyond funding levels of the LRTP. We assume that these projects and programs will be funded through new or innovative funding programs that SCAG has identified in the Draft 2012 RTP as “reasonably available” funding sources over the life of the RTP. Examples of projects beyond the funded LRTP include:
  - East-West Freight Corridor between the I-710 and the I-15.
  - Phase I of the California High Speed Rail Authority (CHSRA), pending an agreement between CHSRA, Metrolink and LOSSAN to identify funds to bring local systems up to high speed (110+ MPH) where possible.
  - A regional Express/HOT Lane Network that expands our Fast Lanes pilot project to include the I-405 and SR-91.
  - Various modal programs, including bus and rail expansion, TDM, TSM, bicycle, pedestrian, and operations and maintenance.
- MTA has proposed and is advocating a program known as America Fast Forward (formerly known as the 30/10 Initiative) to look at federal loan and bonding mechanisms which could accelerate the completion of 12 transit projects in 10 years instead of 30 years. We believe that such a program is beneficial to Southern California counties that have a tradition of self-help local sales tax mechanisms, and that those self-help traditions should be rewarded through new federal bonding or loan assistance programs. Clearly this program would assist the region in the earlier attainment of federal and state air quality conformity and GHGe reduction requirements. We would recommend that a section be included in the Draft 2012 RTP regarding America Fast Forward, and that this section include SCAG policies and actions to partner with MTA and other county transportation commissions to support and advocate for federal enactment of this program.

### Additional Technical Comments on SCAG Draft 2012 RTP/SCS

- We note that page 50, paragraph 3 states that “our region has virtually no bus lanes, especially compared to other major metropolitan areas.” We would suggest that this reference be revised to acknowledge that MTA has opened the highly successful Orange Line busway, has federal approval of a Very Small Start Grant to implement bus lanes on Wilshire Boulevard, and that the MTA Board has recently directed staff to conduct a countywide transit study to identify a minimum of five additional bus lane candidate projects. Additionally, we have been operating dedicated bus services for some time on the El Monte Busway and on the Harbor Transitway.
- The Transit Policies on page 50 and the SCS chapter make reference to High Quality Transit Opportunity Areas (HQTAs). We would encourage SCAG to identify in the Draft 2012 RTP the specific areas that will be designated as HQTAs and the benefit of this designation.
- On page 66, in the paragraph on “Logistics activities – including warehouse and distribution facilities”, we would suggest adding that warehouses and distribution centers also perform value-added services to prepare goods for retail sale, such as packaging and adding of accessories. These services also create jobs for the SCAG region.
- On page 67, in the section “Components of the Regional Goods Movement System”, we would encourage SCAG to add rail intermodal facilities (ICTF, Hobart, etc.) as a separate bullet point for two reasons. First, they play a significant role in the goods movement system, while also generating traffic and environmental impacts. Second, they are mentioned as a component of the rail improvement strategy (ICTF and SCIG are specifically mentioned).
- On page 71, it should clarify in the text that even though the specific alignment has yet to be determined, the east-west freight corridor would generally parallel the UP Los Angeles subdivision/SR-60 between the I-710 and I-605, San Jose Creek/SR-60 between the I-605 and SR-57, and the SR-60 east of the SR-57.
- On page 71, the text states the benefits of an east-west corridor, but SCAG may also want to state why this corridor was selected over the 210, 91, and 10 using information contained in the Comprehensive Goods Movement Study.
- On page 71, SCAG may want to highlight that the east-west freight corridor is envisioned to be a clean freight corridor similar to that which would be built on the I-710.

- On page 72, we suggest that the bottleneck relief strategy report should be included in the technical appendix and footnoted in the “Bottleneck Relief Strategy” section.
- On page 72, SCAG may want to add another paragraph on smaller-scale, near-term goods movement improvements, such as truck climbing lanes on the I-5 and arterial improvements throughout the region.
- On page 74, under Key Rail Projects in the Draft 2012 RTP, we encourage SCAG to highlight the ACE San Gabriel Trench, as it is the largest and most significant ACE grade separation project (\$498 million).
- We concur that the Orangeline High-Speed Transit corridor improvement from Union Station to Palmdale is in the Strategic (unfunded) portion of the Draft 2012 RTP/SCS.
- On page 207 of the main RTP/SCS document, in the last paragraph, that refers to America Fast Forward, please add “and 14 highway projects” in the third sentence after the phrase “to build 12 key mass transit projects”.

#### Passenger and High Speed Rail Comments Starting on Page 51

- We suggest that SCAG add a definition of the acronym “LOSSAN”.
- To clarify which draft CA HSR Business Plan is being referred to, SCAG may want to add the 2012 date.
- SCAG may want to indicate that the CA HSR is estimated to reach our region with the Initial Operating Segment (IOS) in 2021, and the Bay to Basin phase in 2026. Furthermore, it should be clarified in other locations in the document, that the IOS will connect to southern California’s network in 2021.
- Since the actual speeds for the system will vary by location, SCAG may want to remove the reference to the definition of 110 MPH for the CA HSR system.
- On page 51, subsection “Implementation of Phase 1 of the California High-Speed Train (HST) Project”, SCAG may want to define which “Authority” is being discussed.
- We request that SCAG clarify that Prop. 1A will allocate \$9.95 billion in funding for the project (the current Draft reads almost \$1 billion less: “\$9 billion”).
- We suggest that SCAG state that the \$950 million in funding needs to be allocated by the State. Furthermore, a Memorandum of Understanding is anticipated between the CAHSRA and southern California agencies to identify funds for the region for advance investment in high speed rail corridors and connections.

- On page 52, we suggest that SCAG provide a definition or description of “grade closures”.
- We suggest a source of where the LOSSAN strategies are from, to provide clarity.
- Starting at the bottom of page 52, in the section “Improvements to the Existing Metrolink System”, we note that positive train control is not a “strategy”, it is mandated by Federal law. SCAG may want to add that Metrolink will incorporate this developing technology two to three years ahead of the rest of the nation’s passenger railroads.
- The term “speed capacity improvements” needs to be clarified: either it is a “speed improvement” or a “capacity improvement”.
- The second paragraph on page 53 suggests that Metrolink will be connected in 2035 when the HST reaches the Central Valley. We suggest rewording the paragraph to be in accordance with Metrolink’s operational area and the California High Speed Rail Authority’s Business Plan.
- Furthermore, the final sentence in this paragraph implies that it is known what would be needed for travel times of one hour. This is under study regarding the feasibility for Metrolink operations. We ask that SCAG state that there may be significant costs and impacts of such an option.

## **Addendum to Comments on the Draft 2012 RTP/SCS Comments on the Technical Appendices**

- It appears that all strategic projects from the Supplement #1 Strategic Plan to the 2009 LRTP were added, but the original strategic projects from the 2009 LRTP were not added. Please add the 2009 Strategic Projects on pages 31 and 37.
- In the Transportation Safety Appendix, we suggest using the term “people [or persons] with disabilities” for describing members of the public for whom the Americans with Disabilities Act applies.
- The Sustainable Communities Strategies (SCS) Background Technical Appendix should include the methodology for calculating GHG emission reductions associated with the RTP/SCS alternatives, including assumptions and discussion of off-modeling analysis.
- The SCS Background Technical Appendix should provide some discussion of the relative benefit of various transportation and land-use strategies toward reducing regional greenhouse gas emissions. For example, how much of the reduction is attributable to the VMT fee, TDM measures, TSM measures, etc. Moving forward, this information would be useful for cities and other agencies seeking to reduce GHGs in local Climate Action Plans and transportation planning efforts.
- In the Aviation and Ground Access Technical Appendix: on page 126, on Table 4-8, under the Exposition Light Rail Phase II, the description currently reads that it will “connect” to the Exposition Light Rail Phase I, and it should be corrected to say that it will “extend the Exposition Light Rail Phase I”; and, the same Table 4-8 should include the Slauson Light Rail: Crenshaw Corridor to Metro Blue Line Slauson Station (RTP # 1120003) because it provides additional access to LAX.
- On page 7 of the Executive Summary, and on pages 95 and 100 of the Draft 2012 RTP/SCS, we request that SCAG replace the word “tunnel” and replace it with “transportation improvement options”.
- In the Project List Appendix please make the following changes:
  - On page 27, delete the description for the 13<sup>th</sup> entry and replace it with, “Route 710: Study to evaluate transportation improvement options and prepare alternatives analyses, engineering and environmental studies” (EA #187901 and PPNO# 2215).

- On page 162, delete the description for the fifth entry and replace it with, “Route 710: Study to evaluate transportation improvement options and prepare alternatives analyses, engineering and environmental studies” (EA #187901 and PPNO# 2215).
- On page 163, in the first entry, delete the description and replace it with, “Develop transportation improvement options”.
- On page 430, the fifth entry, delete the alternatives to the SR-710 tunnel option and replace it with, “SR-710 transportation improvement options”.
- On page 432, the sixth entry, delete the description and replace it with, “SR-710 transportation improvement options”.
- In the Highways and Arterial Appendix, on page 3, the first entry under Toll Lanes heading, delete the description and replace it with “Develop transportation improvement options”.
- Regarding the Passenger Rail Appendix:
  - On Page 1, reference is made to Amtrak service. It should be stated that all Amtrak service other than the Pacific Surfliner are intercity and long distance routes that connect Los Angeles County and adjoining counties with destinations throughout California and the United States. Also, the Antelope Valley Line is part of the LOSSAN Corridor between Burbank Junction and Los Angeles Union Station.
  - The Passenger Rail document should eliminate reference to Maglev and the SCAG HSRT as this creates confusion and appears to indicate that the technology and the proposed corridor are still under consideration. As written, it appears as if the Maglev technology and the California High Speed Rail program are in competition with each other. It is unclear why this is heavily covered in this document when the conclusion is that the project is no longer planned.
  - The vision for rail service in the Southern California region should provide a stronger emphasis on intermodal linkages at the three regional airports that will be physically or temporally linked to the California High Speed Rail. These airports include Palmdale, Bob Hope and Ontario. Each of these airports already has passenger rail accessibility, but this will be strengthened as a result of current planning and system development efforts.
  - The document should amplify on the role of regional rail integration and service/operating improvements in meeting regional greenhouse gas reduction and vehicle miles traveled/vehicle trip reduction goals. Further, the document should identify the passenger rail station areas

as candidate locations for land use intensification that address the regional jobs/housing imbalances.

- The discussion of the statewide HST system and what it means for southern California is fragmented. There should be a clearer definition of the technology, routes, and what it means for regional connectivity.
- The document should make clearer the desired effect of the Early Infrastructure Investment initiative both to develop the way for High Speed Rail and to incrementally upgrade existing infrastructure to support higher speed, more efficient and safer passenger rail service linking the region to the High Speed Rail system. This could include reference to the use of shared corridors and shared corridor/shared track scenarios that will help improve existing passenger service and enhance service integration across the region.
- The discussion of the Pacific Surfliner should refer to the recent efforts to develop the business plan for the corridor and the addressing of short term improvements. Also, the discussion should include the efforts to create synergy in the corridor and the efforts to move towards local governance. The discussion should include the advantages of this.
- The discussion of Metrolink should include capital studies in Los Angeles County that are underway. Specifically it should include:
  - Antelope Valley Line Study - this is a comprehensive study of the Antelope Valley Line (AVL) for capital improvements and enhancements to the overall safety. The study will address capacity and travel time issues as well as grade crossing upgrades and grade separations. The proposed improvements will be modeled and from that a prioritization and funding strategy will be developed for implementation of the improvements.
  - CP Raymer to CP Bernson Double Track - this is Preliminary Engineering and Environmental work (PE/NEPA) to double track this segment of the Ventura Line. This project will complete the double tracking of the LOSSAN Corridor from Chatsworth to Orange County. Metro received an ARRA grant for this work and is partnering with Metrolink to complete it. Metro is pursuing funding for construction.
  - Van Nuys Station - The Van Nuys station on the LOSSAN Corridor is used by Amtrak and Metrolink. This is a single platform station that is an operational bottleneck in the system.

Metro received an ARRA grant to perform PE/NEPA work for a second platform at this station.

- Strategic Studies - Metro is moving forward with strategic studies of the other Metrolink lines in Los Angeles County. Metro will be working with the other member agencies on shared lines to develop overall strategic priorities.
- On Page 15, regarding the discussion of decision points after construction of the Initial Construction Segment (ICS); there will not be a decision to continue the project. That will be an ongoing discussion prior to that. Prior to the completion of that segment there will be discussion regarding proceeding north or south. The document should not discuss decision points for the system. This will be an ongoing process for the CHSRA and will be based on business models and funding opportunities. Also, on this page the various stages should use the term "extend" rather than "build".
- Note that the CHSRA has decided to move forward with a Palmdale station and not move forward with the I-5/Grapevine alternative. This should be mentioned and the discussion should include what this means for the Palmdale area.
- Page 17 refers to the "Authority's draft 2011 Business Plan". This may be the California High Speed Rail Authority but it is noted within the Metrolink discussion and can confuse the reader. We suggest stating the specific Authority involved.



February 14, 2012

President Pam O'Connor and Members  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear President O'Connor and Regional Council Members:

We thank the Southern California Association of Governments (SCAG) and its staff for the hard work on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Latino Health Access is particularly pleased to see that important health and equity indicators were included in the strategy positively impacting the health of our community.

The high levels of air pollution and health problems experienced in the Southern California region require strong action to transform transportation and land use planning. The Los Angeles region continues to be rated as the most polluted area for ozone in the country by the American Lung Association and the public health toll remains high.

We trust and rely on the research by the American Lung Association in California. The agency quantified the respiratory health benefits of smart growth strategies in the Southern California region. Their analysis showed that the **six-county Southern California region could avoid over \$16 billion in cumulative health and societal costs** through smart growth strategies that reduce the growth in the region's vehicle trips by 20 percent by 2035. While large, these benefits may represent a small fraction of the greater benefits that accrue with more physically active transportation options, as envisioned and quantified by the California Department of Public Health's I-THIM modeling project. Understanding the potential benefits of given planning scenarios will help to identify plans that provide the greatest reductions in harmful emissions and chronic illnesses.

As an agency we see firsthand the effects that obesity and diabetes has on the lives on our clients and recognized the need for greater focus on a shift to active transportation modes like walking, cycling and transit that reduce pollution emissions and gets people out of their cars and into a more physically active lifestyle.

We join the American Lung Association in offering the following comments and recommendations to ensure that the Sustainable Communities Strategy and future

transportation investments place sufficient emphasis on promoting active transportation modes and transit oriented development, measuring and improving health progress, and ensuring that health and equity are imbedded in the decision making process for this plan and future planning efforts.

### **Key Health Recommendations for SCAG SCS**

- **Increase active transportation investments to more than \$12 billion a year.** While we appreciate the increase in active transportation funding included in the draft SCS, we believe more funding is needed. A recent study by the Los Angeles County of Public Health estimated that up to \$40 billion could be needed to build out all of the current bicycle and pedestrian projects in Los Angeles County alone. SCAG, in coordination with health departments and organizations, should conduct a Comprehensive Needs Assessment for the Southern California region to determine the infrastructure needs to develop a network of bicycle and pedestrian pathways and transit connections. Analysis is also needed of how SCAG's bicycle and pedestrian per capita investment compares with other regions.
- **Improve Assessment of health benefits through new modeling approaches.** Utilize the new California Department of Public Health I-THIM screening tool to analyze the potential chronic disease reductions that can be achieved in the SCAG region based on increased transportation-related physical activity such as walking and biking. This model was used in the San Francisco Bay Area region to determine reductions in heart and respiratory disease, breast cancer and other health effects linked to active transportation scenarios. We urge SCAG to incorporate this tool in regional planning and decision making for transportation investments.
- **Include the attached list of 13 health and equity metrics in the SCS and monitor over time, including expanded public health targets.** In addition to monitoring premature mortality, SCAG should also assess reductions in asthma incidence and exacerbations due to traffic related pollution (NOX) and other targets through collaboration with local health departments, the South Coast Air Quality Management District, academic researchers and community based organizations. Improvements to the targets should be monitored and reported to the public every two years. *Additional comments on the targets already included by SCAG in the SCS will be sent in a separate comment letter.*
- **Focus investments on completing transit systems** and building out transit infrastructure, rather than highway expansion, including the following:
  - Doubling Metrolink ridership by 2020 and double it again by 2035
  - Expanding Bus Rapid Transit and regional bus service
  - Enhancing TOD planning and 1<sup>st</sup>-mile-last-mile investments near Metrolink stations
  - Doubling the bicycle network to 24,000 miles and improving pedestrian environment
- **Front load active transportation funding.** SCAG should commit to a higher amount of transportation funding for bike and pedestrian infrastructure, especially in the early years of the 25-year RTP process. SCAG should work with local transportation agencies

to prioritize bicycle and pedestrian projects and ensure the majority of funds are spent prior to 2020.

- **Increase investments in zero emission freight transportation** in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards. Ensure that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies and infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially those living along the freight corridor.
- **Evaluate the number and type of new developments** that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP. Work with air district, health departments and universities to develop and implement best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.

As health and medical organizations and professionals, we recognize that strong government policies to control harmful emissions and that dramatically increase options for active transportation are critical to improving public health and quality of life in Southern California. We stand ready to assist you in implementing a truly health protective, equitable and sustainable plan for Orange County and all of Southern California.

Signed,

*Dolores Gonzalez-Hayes*

Dolores Gonzalez-Hayes

Director of Policy

Latino Health Access



*Co-Chairs:*

Governor Gray Davis (Ret.)  
Jessie Knight, Jr.

February 14, 2012

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

RE: Southern California Leadership Council Comments on the Draft 2012  
Regional Transportation Plan & Sustainable Communities Strategy  
(RTP/SCS) and the Draft Program Environmental Impact Report (PEIR)

Dear Hasan,

On behalf of the Southern California Leadership Council (SCLC), we would like to acknowledge the Southern California Association of Governments (SCAG) and both its staff and leadership who have worked diligently to prepare the Draft 2012 Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS) Program Environmental Impact Report (PEIR), and associated documents. This first of its kind effort, as called for under SB 375, has taken over three years and involved an unprecedented level of collaboration between SCAG and its public and private sector stakeholders from throughout the region. The degree of outreach and engagement is exceptional and SCAG should be applauded for its efforts.

As you know, the Southern California Leadership Council is a non-partisan, non-profit, business-led public policy partnership. The Leadership Council exerts strong leadership on issues of regional significance, providing a common voice on major public policies critical to economic vitality, job growth and quality of life in Southern California. The Leadership Council unites business and community leaders from throughout the seven-county region into one effective leadership organization whose membership includes three former California governors and two dozen presidents and CEO's of top Southern California companies.

*Ex-Officio:*

Governor Gray Davis (Ret.)  
Governor Pete Wilson  
Governor George Deukmejian

*Executive Staff:*

Billie Greer  
*President*  
  
Richard Lambros  
*Managing Director*

SCLC appreciates its strong working relationship with SCAG and its ability to provide business and industry input into SCAG policies and initiatives. In particular, SCLC has been an active participant in the over three year long process of crafting and developing the RTP/SCS. Based on this extensive involvement, SCLC offers the following general comments and recommendations on the draft plan and requests that this letter be included in public record as our collective comments on the Draft RTP/SCS, PEIR and associated documents.

**SCLC's Position** – SCLC supports a 2012 RTP/SCS that recognizes the critical importance of transportation and infrastructure to economic vitality, job creation and the quality of life for all Southern Californians. We also support an RTP/SCS that honors market forces, local control and flexibility as it works to secure an integrated approach to land use, transportation, housing and environmental planning in order to achieve GHG emission reductions under the SCS.

In evaluating SCAG's Draft 2012 RTP/SCS to determine if it is such a plan, from early on SCLC has applied a consistent set of policies and principles related to good planning, to assure that the RTP/SCS is a smart, feasible, flexible, accountable plan that is CEQA compliant, economically sound and preserves existing employment and enhances job creation.

The following is the specific set of key policies and principles that SCLC and others in the business community have applied in evaluating the plan; and we believe that they represent the qualities of a good and sound RTP/SCS.

- **Provides Positive Economic Impacts ... A Plan that is Pro Economic Growth and Job Creation** – The RTP/SCS must undergo a true economic cost/benefit analysis so that economic impacts are understood and known by both SCAG Regional Council members and stakeholders well before making a final decision on the RTP/SCS.
- **Provides Local Control:**
  - Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority.
  - Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use, transportation and community development.
- **Assures New Revenue Sources are Fair, Equitable and Economically Sound** – New transportation revenue concepts within the RTP/SCS must undergo cost/benefit and other appropriate analysis to assure that they are economically sound. They must also be fair and equitable, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.
- **Is Balanced and Accountable** – The plan's call for new revenue is balanced with performance measures, reforms and guarantees that assure the RTP/SCS is effective, efficient and responsible to the citizens and taxpayers of Southern California.
- **Is CEQA Compliant and Defensible** – The RTP/SCS is processed correctly from an environmental impact perspective and built to withstand a CEQA Challenge.
- **Provides for CEQA Streamlining and Protects Against CEQA Abuse** – The plan is crafted so as to capture and make feasible all available CEQA benefits, especially streamlining, while also anticipating and limiting opportunities for CEQA abuse.

**SCLC's Comments and Recommendations** – In measuring the draft plan against these key policies and principles, we find many very positive aspects of the RTP/SCS – especially those related to the plan's core principles, approach and direction. Likewise, we find a number of other aspects of the Draft 2012 RTP/SCS in need of much more consideration, correction and clarification before SCAG finalizes and approves the plan. Most notable among our concerns is the Draft PEIR, which we believe is in need of significant amendment in order to be more in-line with the same core principles, approach and direction reflected in the Draft RTP/SCS.

Outlined below, in very general terms, are SCLC's comments and recommendations related to specific aspects of the Draft RTP/SCS and PEIR that we believe need to be addressed and corrected in the final plan documents.

1. **PEIR** – The Draft PEIR document, unlike the Draft RTP/SCS, does not feel like it honors the same principles of local control and local flexibility that SCAG has employed throughout the RTP/SCS process. Instead, the PEIR feels like a “top-down”, prescriptive, “one-size-fits-all” imposition by SCAG. That is because the PEIR contains a huge litany of mitigation measures that will be imposed mainly upon local government, business and private project proponents. The more than 500 mitigation measures outlined are highly prescriptive and many promote and/or mandate policies which will have no effect in reducing GHG. Additionally, a significant percentage of the measures are redundant to or supersede the regulatory requirements of other agencies that are themselves vested with the authority to oversee such issues (i.e. Regional Water Quality Control Boards, Air Quality Management Districts, US Fish and Wildlife, etc.). Ultimately, a review of the PEIR leaves one feeling that the document is fundamentally inconsistent with the Draft RTP/SCS.

SCLC's specific concerns and recommendation regarding the PEIR are as follows:

- a. **Correct the PEIR's “blanket determination” of feasibility** – The introductory section of the PEIR includes what amounts to an overarching determination that all of the over 500 mitigation measures in the PEIR are feasible for application to all future projects throughout SCAG's region. By making such a statement (which cannot possibly be based on sound evidence) SCAG would impose at least crushing procedural costs on every plan and project throughout the region. Effectively eliminating local flexibility and local authority to determine feasibility on a project by project basis. This blanket finding of feasibility must be removed from the final PEIR.
- b. **Prevent the loss of appropriate project-level flexibility** – The Draft PEIR uses the phrases “local jurisdictions can and should” and “project proponents can and should” require or incorporate a whole host of suggested mitigation measures. Thus, the Draft PEIR seems to pre-determine the anecdotal consideration and possible feasibility of these measures, which could ultimately force local governments and project proponents to “rule out” each and every mitigation measure listed. The use of “can and should” needs to be corrected within the final PEIR.

- c. **Substantially reduce the volume of Mitigation Measures** – The huge litany of mitigation measures that will be imposed mainly upon local government and business needs to be closely looked at and culled in the final PEIR. Especially when you consider the apparent redundancy of many of the measures.
  - d. **Craft the PEIR so as to foster CEQA streamlining and limit CEQA abuse** – SCAG should not forget that the main reason many stakeholders supported SB 375 and the SCS process is that it promised to deliver a number of opportunities for CEQA streamlining and facilitate reasonable progress. The PEIR, with its volume of mitigation measures, makes it more likely that project applicants and local jurisdictions will see added cost and delay (if not litigation) in the CEQA process; and few projects, if any, are likely to achieve a streamlined CEQA approval. This issue needs to be addressed and corrected within the final PEIR.
  - e. **Assure that the PEIR honors Local Control** – With its high level of prescription and regional imposition, the PEIR runs counter to the principles of local control and local flexibility that SCAG has employed throughout the RTP/SCS process. By incorporating the recommendations offered above, the final PEIR will become more consistent with the Draft RTP/SCS in its recognition and support for local control.
2. **Transportation Analysis Zones (TAZs)** –The Draft RTP/SCS suggests (on page 148 of the draft SCS particularly) that future policy conformity determinations should be made by comparing projects with some undisclosed data set related to the projected dispersion of populations and employment, shown and categorized at the level of sub-jurisdictional “transportation analysis zones.” The TAZ level of detail is, we believe, too small and precise a level at which to prescribe policy outcomes concerning the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. The SCS should, therefore, be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or sub-regional level, not at a TAZ level.
3. **New Revenue Sources** – The Draft RTP/SCS needs to provide more detail, clarity and explanation concerning the new revenue sources that are outlined within the plan document. New revenues account for \$219.5 billion out of the total \$524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS). To evaluate these proposals fully and fairly, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following:
  - a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.

- b. The new revenue sources within the RTP/SCS must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.
4. **Federal Level Fee Imposition** – New revenues from fees on businesses operating in the SCAG region – and particularly the “Freight Fee/National Freight Program” listed on page 96 of the Draft RTP/SCS – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region’s competitiveness will be compromised.
5. **Goods Movement** – In the RTP/SCS, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system.
6. **Economic Analysis of the Draft RTP/SCS** – Throughout the process of developing the RTP/SCS and especially in the last few months leading up to the release of the Draft Plan, SCLC regularly called for a valid economic analysis of the plan – one which would provide a true cost benefit analysis. It should be noted that SCLC was not the only one concerned about the plan’s potential economic impact. In fact, this past summer, when SCAG conducted a series of 18 RTP/SCS Public Outreach Workshops, a majority of participants indicated that the economy was the most important priority for the region – finishing ahead of transportation and the environment.

As a result of this and the clear linkage between the RTP/SCS and the economy, SCAG deployed a team of outside economists to do a complete economic impact analysis of the Draft RTP/SCS. SCLC applauds SCAG’s commitment to providing thorough economic analysis, including an evaluation of the plans impact on jobs and job creation. With the work of the economists now mostly complete, their impact analysis of the plan has produced some extremely positive data, showing the costs of the plan to be far exceeded by the benefits the RTP/SCS will provide in the way of job creation and economic growth in our region. SCLC strongly encourages SCAG to widely communicate this economic data and to be sure and include all appropriate new economic data sets and analysis in the final RTP/SCS.

7. **Phase II Economic Recovery Strategy** – SCLC agrees with SCAG’s GLUE Council, that if SCAG utilizes the work done last year to develop and adopt SCAG’s first ever regional Economic Recovery Strategy and couples this with the outstanding economic analysis conducted by SCAG in support of the RTP/SCS, SCAG is well positioned to develop a Phase II Economic Recovery Strategy as a companion measure for adoption in conjunction with (or shortly thereafter) the final RTP/SCS.

The Phase II Economic Strategy would be a way for SCAG, its GLUE Council, local government the business community and other stakeholders to come together and support critically necessary regulatory reforms and strategies to help reinvigorate the region's economy and support the full implementation of the RTP/SCS. The Phase II Strategy would also give SCAG and GLUE a vehicle for establishing a true Regional Economic Plan to go along with SCAG's other regional plans such as the RTP, the SCS and RHNA.

**Conclusion** – While SCLC finds a number of very positive aspects in the plan, especially related to principles and direction, there is still work to be done, significant issues to be addressed, and details to be developed. With this in mind, SCLC is committed to completing this process and working closely with SCAG.

Just as it has done over the multi-year process that has lead up to the Draft RTP/SCS and PEIR, SCLC will remain very active and engaged on this issue throughout the remainder of the process as we work together to finalize and approve a 2012 RTP/SCS and PEIR for our region that is business friendly, economically viable, promotes job creation and enhances the quality of life for all Southern Californians.

Respectfully submitted,



Billie Greer  
President  
Southern California Leadership Council



Richard Lambros  
Managing Director  
Southern California Leadership Council

**Elise Kalfayan**

**Glendale CA 9**

February 14, 2012

Southern California Association of Governments  
Attention: Margaret Lin  
Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017

Sent via email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

**Subject: Comments on SCAG DRAFT 2012 RTP and the Plan EIR**

SCAG's draft 2012 RTP and its EIR are both flawed, do not meet AB32 and SB 375 goals, and will not move this region toward better mobility, an improved economy, or sustainability.

The plan advocates expanding and extending urban highways, building a dedicated truck route for freight movement, and creating more conventional goods movement platforms such as the BNSF SCIG project. According to the EIR, these have "significant and unavoidable impacts." **The plan's slate of projects will worsen air quality, increase congestion and safety risks on roadways, pose threats to public health, and degrade the environment overall and specifically of those communities adjacent to such infrastructure.**

The RTP places emphasis on goods movement, and argues that conventional roadway expansion is necessary for goods movement. The Plan EIR, however, only considers **residential development** alternatives ("with minor changes to goods movement and transit projects"), and does not consider goods movement alternatives. This is contrary to the spirit of CEQA requirements.

The EIR is flawed and incomplete as it does NOT evaluate the alternative of electrified rail infrastructure for goods movement from the ports, which has the potential to:

- improve air quality
- decrease congestion and safety risks on roadways
- reduce threats to public health
- integrate rail infrastructure into environmental renewal projects
- create transit corridors that link communities within the region

Specific zero-emission, electrified rail freight options such as the GRID project have been proposed and discussed. The concept of such a system is placed in the "for future study," unfunded section of the plan, when it belongs as a viable alternative analyzed in the EIR.

The EIR should have offered a direct comparison between the impacts of all conventional goods movement expansion projects in the current draft plan, and a fast-tracked, zero-emission, electrified rail system for goods movement.

Elise Kalfayan

**Postscript** re the Plan's Jobs Section:

As economic leaders in this region are aware, the Panama Canal and other ports are working aggressively to capture a larger share of cargo traffic. The draft RTP's goods movement priorities – conventional highway expansion and more trucks now, electrified rail later – allocates billions in public funds to **projects that will not keep this region competitive**. Money should instead be allocated to cutting-edge freight movement technology, putting the region's ports in a competitive stance while contributing to AB32 and SB375 goals.

*Bonnie Holmes-Gen*  
**American Lung Association  
of California**

*Neil Richman*  
**BREATHE California of  
Los Angeles County**

*James Provenzano*  
**Clean Air Now**

*Jonathan Parfrey*  
**Climate Resolve**

*Luis Cabrales*  
**Coalition for Clean Air**

*Lars Clutterham*  
**downeygreen**

*Jocelyn Vivar Ramirez*  
**East Yard Communities for  
Environmental Justice**

*Jane Block*  
**Endangered Habitats  
League**

*Cesar Covarrubias*  
**Kennedy Commission**

*Victor Griego*  
**Latino Business  
Association Member**

*Alexis Lantz*  
**Los Angeles County  
Bicycle Coalition**

*Denny Zane*  
**Move LA**

*Patty Ochoa*  
**Physicians for Social  
Responsibility**

*Jessica Meaney*  
**Safe Routes to School  
National Partnership**

*Darrell Clarke*  
**Sierra Club**

*Paul Zimmerman*  
**Southern California Assn. of  
Non-Profit Housing**

*Rev. Earl W. Koteen*  
**Unitarian Universalist  
Legislative Ministry  
California**

*John Longville*  
**Former Mayor of Rialto &  
former SCAG President**

February 14, 2012

Pam O'Connor, President  
Regional Council  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear President O'Connor,

We congratulate the leadership and staff of the Southern California Association of Governments and its Regional Council members on the agency's first-ever Sustainable Communities Strategy and Regional Transportation Plan that meets the 2020 and exceeds the 2035 greenhouse gas reduction targets, achieves Clean Air Act conformity, and reduces vehicle miles traveled and traffic congestion—despite projected population growth of about four million residents by 2035.

We applaud SCAG staff for their leadership and for their collaboration with local governments, county transportation commissions and a wide range of non-governmental organizations. This effort was particularly challenging given it is the first time anyone in the region has put together an SCS. In the spirit of creating a stronger RTP/SCS this year and in future years we offer these recommendations.

### **Key changes to strengthen the RTP/SCS**

Although the draft RTP/SCS meets the SB375 targets, changes in four key areas would make the plan even stronger in terms of moving the region closer to sustainability.

1. Ensure adequate, achievable funding to carry out the RTP/SCS
2. Expand funding for transit, Metrolink, bus rapid transit, bicycling, pedestrian travel.
3. Make a tighter link between transit and land use throughout the region.
4. Take greater measures to reduce GHG and other emissions from freight.
5. Improve public health monitoring and benefits, especially in environmental justice communities.

### **1. Ensure adequate funding to carry out the RTP/SCS.**

We applaud SCAG's goal of bringing all roads to a "state of good repair," and understand the policy decision to look for new revenue sources rather than to eliminate transportation projects in order to address the RTP's projected \$200 billion shortfall. We understand that it may be more politically palatable for the Regional Council at this time to project reliance upon expanded federal sources, such as indexed gas tax or a transition to an equivalent VMT fee, but that does not make it more achievable.

**a. *Emphasis should be on more achievable revenue sources such as local voter approved fees or taxes rather than more speculative federal sources***

The recent history of voter response to county-based transportation funding measures in the SCAG region suggests a more promising local direction. The experience with Measure R in LA County and the recent extension of sales tax measures in other SCAG counties demonstrates to us that regional voters are not as tax-averse as some believe, especially when voting on measures to fund well defined local transportation investment, if they have confidence in the agencies and are clear about investment priorities. Voters in Los Angeles County approved sales tax measures by 54% in 1980, 50.4% in 1990, and 67.8% in 2008. This suggests an increased willingness, not reluctance, to support transportation investments by LA County voters. In San Bernardino, Riverside and Orange sales tax extensions were easily approved: Riverside voters approved Measure A in 2002 with 69% of the vote; San Bernardino County approved Measure I in 2004 with 80% of the vote; and Orange County approved a sales tax extension in 2006 with almost 70% of the vote. In each case the original sales taxes had been originally approved with narrow majorities.

The point is that, with the exception of Ventura County, voters throughout the SCAG region have consistently voted to approve new or extended sales tax measures for transportation improvements by substantial and increasing majorities in excess of 2/3. If a county or the region needs more funds for transportation investments, local voters seem a more promising opportunity of first resort than a contentious State Legislature or the Congress.

We urge SCAG to work to challenge its member transportation commissions to go to voters in the near future for local and regional funding solutions instead of “punting” this problem of a regional funding shortfall to the federal government. In other words, let's make the funding of regional planning more achievable, and thus more real.

**b. *Recommendation: Develop regional revenue sources to fund regional projects.***

There are a number of transportation systems that are vital to the welfare of the Southern California region as a whole, rather than specific counties. This includes the 450-plus-mile regional commuter rail system operated by Metrolink and the regional goods movement system. Region-wide investments in each of these systems could yield enormous economic, environmental, and equity benefits. We urge SCAG and its Regional Council to consider taking a truly regional approach to an investment strategy for each of these regional systems by including in the RTP projected additional revenue from a region wide revenue source.

We recommend a broad-based uniform regional tax or fee increase, such as a 1/8 – 1/4 cent increase in sales tax or equivalent parcel tax, that can raise between \$15- \$30 billion over the 25 year life of the plan to invest specifically in regional transportation needs such as meeting the needs of our goods movement infrastructure, modernizing and electrifying the regional commuter rail system, providing expanded BRT and bus service as well as first-mile-last-mile bike-pedestrian infrastructure that would connect to that regional commuter system.

We would pledge to work with you to build support for such a funding measure.

**c. Recommendation: Develop strategies to provide adequate funding to modernize freight transportation projects.**

The goods movement industry is a vital component to the Southern California economy but is also a major reason for our poor air quality and various health impacts affecting the region. Developing and investing in both the zero and near-zero emission goods movement technology and the operational efficacy of the goods movement infrastructure would significantly benefit the region and the many communities of concern that are directly affected by emissions and congestion from transportation and rail activity. Estimates of the regional investment needed could be up to \$25 billion over the life of the plan.

Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies as well as the infrastructure needed for operational efficacy should be a central component of the regional strategy.

For these reasons, we recommend that SCAG include the following strategies:

- Develop a clear assessment of funding options available, including various models of public-private partnerships that could make zero-emission and near-zero emission freight technology options possible and ensure an efficient goods movement system in the region.
- Recommend pursuing legislation seeking a \$30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports and more in subsequent years as cargo activity grows at our ports. Such a program could generate over \$10 billion over the life of the plan.<sup>1</sup> Previous legislative efforts have created a broad coalition to support this measure. Such legislation has been approved twice by both houses of the state legislature only to be vetoed by the previous governor.
- As previously stated, we recommend a broad-based uniform regional tax or fee increase, such as a 1/8 – 1/4 cent increase in sales tax or equivalent parcel tax that could raise between \$15-\$30 billion over the 25 year life of the plan to invest specifically in regional transportation needs such as goods movement infrastructure needs, as well as modernizing and electrifying the regional commuter rail system and related infrastructure.
- Prioritize spending on projects that deliver maximum health benefits for residents of the region.
- Include public health as an overarching priority and goal in the \$2.1 billion annual freight program included in the Environment and Public Works Committee.

**d. Support national efforts to create a strategic plan for the freight system.**

- Encourage SCAG to include language that clarifies the current federal funding restraints and alter the RTP to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100. As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding. The establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Chambers.

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<sup>1</sup> Haveman, Jon, and Thornber, Christopher, Container Fees and Commercial Benefits of Improved Waterborne Goods Movement Infrastructure in California. Beacon Economics, August 2007.  
[http://www.coalitionforcleanair.org/images/stories/Haveman\\_Report\\_Final\\_Aug2007.pdf](http://www.coalitionforcleanair.org/images/stories/Haveman_Report_Final_Aug2007.pdf)

- Actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program.
- Support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written.

**e. *Champion increased Compass Blueprint funding to help local governments update their general plans to implement the SCS.***

While the RTP/SCS shows a significant shift in household growth toward HQTAs, this will in most cases require changes in General Plans and community plans — and ensuring that this will happen is likely to require incentives and other resources. SCAG's Compass Blueprint program was successful in helping many communities move in the direction of smart growth and urban infill years before SB 375. With additional funding, the Compass Blueprint Demonstration Project Program could fund the SCS implementation and ensure that growth happens in an equitable way with minimal displacement, in addition to updating plans. SCAG should also work with the other MPOs to advocate for a statewide "infill first" package of incentives to promote development near transit. SCAG should also consider working with the CTCs to find sources of funding for land use planning in HQTAs.

**2. *Expand proposed funding for transit, Metrolink, bus rapid transit, bicycling, and pedestrian travel into the RTP constrained plan.***

We need increased investment for bus and rail transit, bicycle and pedestrian systems. This is especially true in the Inland Empire where over-dependence on a spreading highway infrastructure and dispersed land use pattern has made residents in these counties very vulnerable to just the kind of economic calamity witnessed in the 2008 – 2012 Great Recession.

In addition, residents of agricultural areas, especially in the eastern Coachella Valley, the North Shore of the Salton Sea and similar communities, remain disproportionately underserved by transit, which makes it very difficult for residents without a car to access health care, groceries, or good jobs. Improvements to bus headways, especially in these areas, could create new HQTAs.

Building transit infrastructure is one of the best ways to create good, "green" jobs that enhance the health and wealth of the region and its residents. Construction work can provide a career path to middle-income jobs through apprenticeship programs that provide young workers with formal training. Agencies that adopt project labor agreements and requirements ensuring that jobs will go to local workers — and/or those who live in areas with high unemployment — help make the local economy more robust because workers' earnings will be spent at local businesses, creating additional jobs and local tax revenues.

**a. *Move enhanced Metrolink investments into the Constrained Plan.***

The Metrolink commuter rail system is a regional gem that could become a major source of VMT reduction, congestion relief and economic development. It links many communities in every county in the region.

We recommend moving into the Final Plan (the Constrained Plan) the upgrading of the Metrolink commuter rail system region-wide to make a planned transition to an all-electric system capable of providing zero-emission high-speed service (up to 110 mph) and enabling expanded express service in select corridors with double tracking, grade separations and other modifications needed. Such an upgrade may cost the region as much as \$8 to \$10 billion, but would be well worth the investment in terms of congestion relief, emission reductions and economic opportunity created. This RTP Constrained Plan enhancement could be funded by new resources, such as the regional sales tax proposed above.

Specifically, we want to highlight opportunities for enhanced investments on several key lines that we believe will create exceptional regional connectivity.

- **The Antelope Valley Line**, which is the focus of current planning efforts to dramatically reduce the time it takes to travel over 76 miles from Lancaster to Union Station by more than fifty percent - from nearly two-hours to about one-hour.
- **The San Bernardino Line's** success with limited express service from downtown San Bernardino to Union Station indicate express service on a regular basis is possible, especially if a direct link into Ontario Airport is created.
- **The Ventura County Line and the Orange County Line** present the possibility of a continuous, high speed, electric express system from Ventura to Union Station to Orange County to San Diego.
- **LA Union Station Run-Through Tracks** project would significantly enhance regional trip potential of all Metrolink corridors serving Union Station by improving efficiency and throughput capacity.
- We recommend additional corridor infrastructure enhancements and improvements in Appendix A.

Each of these Metrolink corridors and projects, if funded and enhanced, will create opportunities for new BRT and enhanced bus service, as well as smart growth infill with first-mile-last-mile bicycle and pedestrian infrastructure in multiple communities and will create enhanced access to the jobs corridors throughout the region.

**b. *Expand Bus Rapid Transit and provide more frequent bus service on high-performing routes linked to Metrolink to give more people alternatives to driving alone.***

Well over 80 percent of transit ridership in the region now uses bus service. While our rail transit system is expanding dramatically, we should expect that heavy reliance on bus service is likely to continue as far out as 2035.

However, while there is a lot of growth projected for the Inland Empire, much of it will not be near existing or planned bus or rail service. For example, in Riverside County, about 40% of residents live near bus lines with some service (15-30 minute headways) but presently only 10 percent of the population is served by high-quality transit (with 15-minute headways). By expanding the Bus Rapid Transit (BRT) system in the Inland Empire, especially where proposed lines would connect with the potentially enhanced Metrolink lines and by bringing up service on select higher

performing lines to 15- minute headways we could increase high-quality transit at a much lower cost.

Our recommendations in Appendix A are limited to improvements to investment in Bus Rapid Transit infrastructure (BRT) and enhanced bus service with connections to the Metrolink Regional Rail network or regional airports. Each of these Metrolink corridors and projects, if enhanced, will create opportunities for new smart growth infill and TOD investment in multiple communities. These corridors could be served as well as by first-mile-last-mile bicycle and pedestrian infrastructure opportunities, and will help create enhanced access to jobs throughout the region.

See Appendix A below.

**c. *Increase funding for active transportation to at least \$12 billion for bicycling and pedestrian improvements.***

SCAG has received an outpouring of support for increased investment in bicycle and pedestrian infrastructure and projects at workshops and hearings across the region, as well from members of SCAG's Regional Council. As was often repeated at the hearings, according to the 2009 National Household Travel Survey of California, 14 percent of all trips in the region are pedestrian while 6 percent are on bikes, and 25 percent of all roadway injuries and fatalities affect pedestrians and bicyclists, yet only 1 percent of the regional investment is identified as going to non-motorized modes. A poll of Southern California voters sponsored by Move LA, NRDC and the American Lung Association late last year found that voters would make bicycle and pedestrian investments a much higher priority.

While we applaud the SCAG staff for recommending that funding for active transportation be increased from \$1.8 billion to \$6 billion, we believe funding should be at least \$12 billion. We believe investments should prioritize first-mile/last-mile connections to transit stations, which will help support the increased investment in the transit system. Investments should also be prioritized for areas of disproportionate high injury and fatality rates and in areas with lower car ownership rates.

Safe Routes to School strategies and investments to improve the safety of students as they walk and bike to school should also be promoted because statewide cuts in school transportation budgets make getting to and from school more difficult for K-12 kids — especially in rural areas where there are no sidewalks or safe bike routes.

We recommend SCAG work with the CTCs to identify funding sources that are flexible and that could be used to prioritize accelerated transit, bike, pedestrian and other traffic-reducing projects. It is our judgment that one appropriate source of funding for this program could be the regional sales (or parcel) tax we have suggested earlier.

**d. *Encourage CTCs and local jurisdictions to adopt "complete streets" policies.***

We believe that SCAG should encourage CTCs and local jurisdictions each to adopt a complete streets policy so that bike and pedestrian improvements can be made routinely and more economically when streets are improved or built. For example, counties in the SCAG region, especially outside of LA County, often include funding for arterial capacity enhancements for streets which largely run between and through community centers. These stretches of boulevards

seem very good opportunities for implementation of “Complete Streets” programs. We recommend that SCAG identify such opportunities and call them out for special programming efforts.

**e. *Work with CTCs to develop a methodology for quantifying the unmet need for bicycle and pedestrian investments to improve safety and increase active transportation.***

SCAG should work with the CTCs to develop a methodology for quantifying the unmet needs, particularly safety needs, for cyclists and walkers. Because concerns about safety may discourage people from walking and biking entirely, surveys may be required, especially in rural areas, to accurately assess the needs of residents. We recommend that SCAG work with the CTCs to develop active transportation budgets and to identify existing and potential local and regional funding sources. One idea, for example, would be to create guidance that would be used to allocate funding in each CTC’s Call for Projects.

**f. *Work with CTCs to ensure full participation of all counties in the funding and implementation of regionally significant transit and goods movements systems that achieve regional objectives like cleaner air, reduced greenhouse gases, expanded access to high quality transit, and mode shift away from driving alone.***

SCAG should encourage county transportation commissions to place a higher priority on investment in transit services and active transportation projects and seek to ensure a fair share investment in these projects among counties either by identifying new revenues locally, shifting funds out of other programmed projects, or participating in the creation of regional revenue sources, and encouraging infill development strategies that keep our momentum toward a higher regional sustainability strong.

**3. Create a tighter link between transit and land use throughout the region.**

The draft SCS takes into account changes underway in the regional real estate market including the shift in new housing development away from the construction of single family homes on large lots and toward the development of multifamily housing -- apartments, townhomes and condominiums -- in more urban environments with easier access to jobs, service and transit systems. The fact that half of all new homes and new jobs will be located near transit under the plan will be a boon to the region’s efficiency, economy and sustainability.

The demographic and real estate trends, more transit opportunities and healthier, active lifestyles, portend a new, and better, version of the American Dream in Southern California. By focusing development in transit areas and downtowns, the draft SCS plan would consume 408 square miles less “greenfield” land than in the 2035 Baseline, which assumes current land use trends.

**a. *SCAG should identify to local jurisdictions adjustments in land use policy that would ensure each county is contributing its fair share to meeting regional goals of cleaner air, reduced greenhouse gas emissions, expanded access to high quality transit, and mode shift away from driving alone.***

Although the region as a whole will achieve reductions in vehicle miles traveled sufficient to meet the targets for reducing greenhouse gas emissions, the reductions are not evenly distributed across the region. These outcomes are the result of both past decisions and future actions

reflected in this draft SCS and RTP. The maps in the RTP/SCS suggest that in some areas, especially Riverside County, significant growth is projected in areas with little or no transit investment.

**b. *Limit High Quality Transit Areas, especially along freeways in low-density areas, to within a 1/2 mile of the stop with frequent services, as opposed to including the entire corridor.***

It is unclear how SCAG defines high-quality transit areas. Under SB 375, a HQTAs is a place that has bus service with headways of 15 minutes or less during commute hours. Several freeway corridors are designated as HQTAs presumably because they have express bus service. But, there is not currently frequent bus service along the I-10 east of I-215, I-15 north of I-10, I-15 south of the 61, and the 33 (Ventura County) which are all designated as HQTAs. Only the area within ½ mile of the stop should be regarded as an HQTAs.

**c. *Include a snapshot of the current jobs-housing fit and develop a methodology for projecting the jobs-housing fit as a result of transportation investments and land use changes for the 2016 RTP/SCS.***

The current mismatch between the location of jobs and housing is at the root of our transportation problems. SCAG should set a baseline for a jobs-housing fit by taking a “snap shot” of 4-to-5-mile buffer zones around major job centers, and then comparing the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good fit. UC-Davis and the Sacramento Council of Governments have developed a relatively simple methodology to do a jobs-housing fit, and are now developing a tool to project the jobs-housing fit into the future. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas.

**d. *Strengthen Conservation Planning Policy***

We commend SCAG for including an advanced mitigation strategy for land conservation. This strategy is an important step forward. We recommend the following changes to strengthen the Conservation Planning Policy section:

- change “critical habitat” to important natural lands because of its limitation to the federal designation and its relationship to endangered and threatened species;
- create an inclusive process for agencies, conservancies, and non-profits to help map and prioritize priority conservation lands;
- include all unprotected undeveloped lands in the inventory of potential mitigation location sites instead of limiting opportunities to just Natural Communities Conservation Plan and Habitat Conservation Plan areas;
- expand the conservation activities to include existing and/or future programs instead of simply already-established programs; and
- Advocate for the advanced mitigation policy to result in the environment ending up better than it started as opposed to no gain (a net environmental benefit) from the standpoint of natural resource lands after construction activities.

#### 4. **Take greater measures to reduce greenhouse gases and other emissions from freight.**

We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the RTP in other areas. In particular, CO<sub>2</sub> emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035. Even more dramatically, CO<sub>2</sub> emissions from rail would increase at least 50% by 2023 and at least 123% by 2035. To mitigate goods movement related emissions, we recommend that SCAG take the necessary steps to:

- a. **Ensure the ports augment the Clean Air Action Plan by creating GHG reduction plans.**
- b. **Devise a set of strategies that account for the differences among local freight service and that of port origin/destination.** Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector's 2nd largest emitter of NO<sub>x</sub>.
- c. **SCAG should identify and promote a sequence of projects** that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost.
- d. **Clean up existing freight corridors, not just the proposed new projects.**  
While we welcome zero emission technology by the year 2035, more short term gains should be implemented. SCAG should further analyze what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology).

#### 5. **Improve public health monitoring and benefits, especially in environmental justice communities.**

We applaud SCAG for adopting a number of performance "outcomes" — in particular, those measuring public health and affordability — that will be monitored during RTP/SCS plan implementation. We believe that these additional performance metrics should be reported to the Regional Council as a way to help encourage implementation of the RTP/SCS. While we understand that SCAG has no authority over local land use or county transportation planning and funding, we do believe that it's critical that SCAG find ways to incentivize RTP/SCS implementation.

- a. **Evaluate the impact by geography of RTP/SCS investments on environmental justice communities by increasing monitoring over successive RTP/SCSs.**

The disparate impacts of transportation investments and land use planning — especially noise and pollution — on lower-income communities is lost in the county-wide or region-wide averaging that SCAG uses. It would also be informative if SCAG monitored a number of geographic areas where environmental justice populations are overrepresented. The Metropolitan Transportation Commission in the Bay Area, for example, does "snapshot" analyses of 44 geographic communities to focus on key transportation-related indicators such as transit service frequency, walkability, access to essential destinations by a 30-minute transit trip, housing and transportation affordability, bike and pedestrian collisions, diesel PM<sub>2.5</sub> emissions, etc. For example, the EJ appendix reports that air quality will be worse for 23-29% of the population with no indication of where they live, making it difficult to design and evaluate the effectiveness of mitigation measures.

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SCAG is planning to track characteristics in 125 transit stations. We recommend instead that SCAG analyze 125 places where environmental justice populations are overrepresented. The analysis could be used to monitor progress over successive RTP/SCSs, and goals could be set and strategies identified to reduce disparate impacts. Where there are disparities, SCAG should propose mitigations and work with the CTCs to improve conditions.

Because the EJ analysis also suggests that low-income people are being displaced from station areas, we also recommend that rail and possibly BRT stations be monitored for the impacts of gentrification — by checking income levels, housing costs, transit usage and car ownership, etc. SCAG could also develop a toolbox of policies, implementation measures and funding sources that could be used to help low-income people continue to live near stations.

**b. *Improve the discussion around performance outcomes and alternatives analyses.***

One of the best ways that SCAG can do this is to help make the outcomes of land use planning and transportation investment choices clearer to Regional Council members and the general public — through reporting on performance outcomes. While the Alternatives 1, 2, 3 & 4 presented at the summer workshops illustrated the impacts of particular policy choices, the Alternatives A, B, C & D were different in ways that were hard to understand. We recommend that in the next RTP/SCS, SCAG should give stakeholders more time and more information to evaluate the different scenarios. We also recommend that SCAG set targets for performance measures and outcomes, and to evaluate the scenarios against these targets early and continuously in the planning process.

**c. *Develop new tools for measuring health & equity impacts in future RTP/SCSs.***

We also believe that SCAG should develop new tools for measuring health and equity impacts in future RTP/SCSs. In particular:

- SCAG should enhance efforts to measure the daily amounts of walking and biking related to work and non-work trips.
- SCAG should also measure chronic disease rate changes based on transportation decisions and resulting physical activity (based on the work of Neil Maizlish of the California Department of Public Health's work with the MTC in the Bay Area and ongoing work with MPOs across the state).
- SCAG will monitor premature mortality due to PM2.5, which is important since the region contributes 53 percent of premature deaths in the state of California due to PM2.5. We recommend SCAG report improvements every two years, and develop a more precise goal in collaboration with the LA County Department of Public Health and the American Lung Association in California.
- SCAG should monitor asthma incidence and exacerbations due to NOx (an emission that is being measured) in collaboration with the California Department of Public Health, the South Coast Air Quality Management District, academic institutions, and others who are focusing on communities most impacted by air pollution, as well as communities located near high volume roadways.

We want to express our appreciation to the SCAG Regional Council and staff for all your efforts in putting together this ambitious plan to make Southern California a better place to live for present and future generations.

Sincerely,

Bonnie Holmes-Gen  
**American Lung Association of California**

Neil Richman  
**BREATHE California of Los Angeles County**

James Provenzano  
**Clean Air Now**  
Jonathan Parfrey  
**Climate Resolve**

Luis Cabrales  
**Coalition for Clean Air**

Lars Clutterham  
**downeygreen**

Jocelyn Vivar Ramirez  
**East Yard Communities for Environmental Justice**

Jane Block  
**Endangered Habitats League**

Cesar Covarrubias  
**Kennedy Commission**

Victor Griego  
**Latino Business Association Member**

Alexis Lantz  
**Los Angeles County Bicycle Coalition**

Denny Zane  
**Move LA**

Patty Ochoa  
**Physicians for Social Responsibility**

Jessica Meaney  
**Safe Routes to School National Partnership**

Darrell Clarke  
**Sierra Club**

Paul Zimmerman  
**Southern California Association of Non-Profit Housing**

Rev. Earl W. Koteen  
**Unitarian Universalist Legislative Ministry California**

John Longville  
**Former Mayor of Rialto & former SCAG President**

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## APPENDIX A

### **Metrolink, bus rapid transit and bus corridors proposed to be enhanced and considered for inclusion in the RTP Constrained Plan.**

#### **1. METROLINK**

Specifically, we want to highlight opportunities for enhanced investments on several existing lines that will create exceptional regional connectivity:

- **The Antelope Valley Line**, which is the focus of current planning efforts to dramatically reduce the time it takes to travel over 76 miles from Lancaster to Union Station by more than fifty percent - from nearly two-hours to about one-hour. Projects to improve its speed and efficiency and avoid unnecessary delays in service, including eliminating unnecessary curves, providing grade separations and double tracking where needed, will make this goal possible.
- **The San Bernardino Line** has already shown great success with limited express service from downtown San Bernardino to Union Station in Los Angeles. Investments to provide double-tracking for some segments of the line, grade separations could enable this line to provide express service on a much more regular basis. A direct link into Ontario Airport would create an exceptional economic development opportunity. Imagine the enhanced investment interest there would be for any community east of LA if it had high-speed express access to Ontario Airport and to Downtown LA via Union Station.
- **The Ventura County Line** also offers the opportunity for high speed express access from Ventura through the North San Fernando Valley with links to the Orange Line at Chatsworth, Northridge and Van Nuys, potentially connecting directly to Burbank Airport, Glendale, on to Union Station.
- **Orange County Line** continues from Union Station to Norwalk, Fullerton, Anaheim, Irvine and beyond to San Diego County. Together with the Ventura County Line it presents the possibility of a continuous, high speed, electric express system serving 25 stations from Ventura to Union Station to Orange County to San Diego, connecting to 4 other Metrolink lines and the entirety of the LA Metro Rail system at Union Station.
- **LA Union Station Run-Through Tracks** project that would significantly enhance regional trip potential of all Metrolink corridors serving Union Station by improving efficiency and throughput capacity, enabling more frequent regional service within LA County.

In addition to the existing corridor infrastructure enhancements and improvements we recommend:

- **Extension of 91 Line** from Riverside to Palm Springs/Coachella Valley, connecting the resort communities in Palm Desert to LA and Inland Empire.
- **Extension of San Bernardino Line** to Redlands and San Bernardino Airport.
- **Harbor Subdivision Service** from Union Station to South Bay Region via LAX, utilizing existing Railroad Right-of-ways to provide Commuter Rail service to an underserved transit region.
- **Additional infill stations** along Metrolink Corridors to support activity centers such as Universities and Major Employment Centers such as Perris Valley Line - UC Riverside Station; San Bernardino Line – Ontario Airport Station branch; San Bernardino Line – LAC/USC Medical Center; Riverside Line - Cal Poly Pomona Station.

## 2. ORANGE COUNTY

### Proposed BRT Enhancements in Orange County

Proposed BRT	Link to Metrolink, Activity Center or Airport	Peak Headway	Off-Peak Headway
Westminster Avenue -17 <sup>th</sup> Street (Long Beach – Santa Ana)	Metrolink / CSULB/VA	10	15
Harbor Boulevard (Fullerton – Newport Beach)	Metrolink /Disneyland	8	15
Bristol Street/State College Boulevard (Brea – Irvine)	Metrolink / John Wayne Airport	8	15

Source: Orange County Transit Authority

### Proposed Bus Enhancements/BRT Conversions beyond current funding in Orange County

Lines	Project Type	Communities/Corridors	Link to Metrolink	Peak Headway	Off-Peak Headway
29	Convert to BRT	Beach Boulevard (Huntington Beach – La Habra)	X	10	15
38	Convert to BRT	La Palma Avenue (Buena Park - Anaheim)	X	10	15
50	Convert to BRT	Katella Avenue (Long Beach – Orange)	X	10	15
53	Convert to BRT	Main Street (Orange – Irvine)	X	8	12
54	Convert to BRT	Chapman Avenue (Los Alamitos – Orange)	X	10	15
70	Convert to BRT	Edinger Avenue (Huntington Beach – Tustin)	X	10	15
	Local Bus	GoLocal Bus Shuttles beyond current funding projections	X	15	30
	Local Bus	Station Link to Metrolink Stations beyond funding projections	X	15	30

Source: Orange County Transit Authority - LRTP

## 3. SAN BERNARDINO COUNTY

### Proposed BRT Enhancements in San Bernardino County

Proposed BRT	Link to Metrolink or Airport	Peak Headway	Off-Peak Headway
E Street sbX Redlands Extension	Metrolink	5	10
Foothill East sbX	Metrolink /San Bdo Int AP	5	10
Foothill West sbX - Foothill	Metrolink	10	15
Euclid sbX	Metrolink	10	15
San Bernardino Avenue sbX		10	10
Holt/Fourth sbX	Metrolink / Ontario AP	10	15
Grand/Edison sbX		10	20
Sierra sbX	Metrolink	10	20
Riverside sbX	Metrolink	10	10
Haven sbX	Metrolink / Ontario AP	10	15

Source: San Bernardino County LRTP

**Proposed Bus System Enhancements  
Best Bets in San Bernardino County**

Lines	Type	Communities	Peak Headway	Off-Peak Headway
1	Local Bus	Colton-Del Rosa	10	15
4	Local Bus	Baseline-Highland-San Bernardino	20	20
8	Local Bus	San Bernardino-Mentone-Yucaipa	15	30
10	Local Bus	Fontana-Baseline-San Bernardino	15	30
15	Local Bus	Fontana-Rialto-SB-Highlands-Redlands	10	15
19	Local Bus	Redlands-Colton-Fontana	20	20
65	Local Bus	Montclair-Chino Hills	15	30
80	Local Bus	Montclair-Ontario-Chaffey	15	30

Source: San Bernardino County L RTP

**4. RIVERSIDE COUNTY**

**Proposed BRT/Bus System Enhancements in Riverside County**

Lines	Project Type	Communities/Corridor	Link to Metrolink	Current Headway	Enhanced Headway
19	Local Bus, Convert to BRT	Perris Boulevard Corridor	X	60	20
20	Local Bus Convert to BRT	Allessandro Corridor	X	60	15
24	Local Bus	Temecula – Pechanga Corridor		70	20
206	Commuter Express Bus (Convert to BRT)	Corona-Temecula I-15 Corridor	X	4 trips each direction (RH Only)	20
208	Commuter Express Bus (Convert to BRT)	Riverside-Perris-Temecula via SR-60/I-215 Corridor	X	4 trips each direction (RH Only)	30
210	Commuter Express Bus	Riverside-Banning via SR-60 Corridor	X	4 trips each direction (RH Only)	30
212	Commuter Express Bus	Riverside-Perris-Hemet via SR-60 Corridor	X	4 trips each direction (RH Only)	30

Source: Riverside Transit Agency

**CITY OF COLTON  
INTEROFFICE MEMORANDUM**

<b>TO:</b>	<b>MARK TOMICH, DIRECTOR OF DEVELOPMENT SERVICES</b>
<b>FROM:</b>	<b>AMER JAKHER, P.E., DIRECTOR OF PUBLIC WORKS AND UTILITY SERVICES DEPARTMENT</b> AS
<b>SUBJECT:</b>	<b>RTP EIR REVIEW COMMENTS</b>
<b>DATE:</b>	<b>FEBRUARY 14, 2012</b>

In response to your e-mail dated 2/13/12 for the RTP EIR review/workshop, Public Works offers the following comments:

1. The City of Colton strongly recommends that a feasibility study be conducted to explore the possibility of locating a commuter rail station in the City of Colton. The potential locations are South La Cadena Dr. north of Fogg St. and within the downtown area, on the existing BNSF tracks. The City is an ideal location for the rail station because of several compelling reasons. First the locations being proposed are almost exactly at the midpoint from existing San Bernardino and Downtown Riverside stations, making it an ideal spot for a rail station. Secondly there are two major freeways that traverse Colton (I-10 and I-215) in east/west and north/south directions providing convenient and ample access. And finally the communities of Colton, Grand Terrace and other adjacent areas have no reasonable point of access to existing rail facilities in San Bernardino and Riverside Counties. Residents must travel long distance to access these facilities, hence making them less apt to use commuter rails. Finally the rail station will help to revitalize the downtown and adjacent areas of Colton that are impacted by the rail roads and the freeways, including the impact of Colton Crossing, that will allow additional trains on the existing rail lines.
2. Attached is the list of RTP that was submitted to SANBAG. The critical element on that list are as follow:
  - a. Reche Canyon Road – Multi jurisdictional project. (Colton, County of San Bernardino, County of Riverside and city of Moreno Valley) Completion of design and environmental phase and securing funding for right of way acquisition and construction.
  - b. Washington Street Extension – multi jurisdiction project. (Colton and Grand Terrace), Completion of design and environmental phase and securing funding for right of way acquisition and construction. This project will also require construction of a rail road grade separation on BNSF rail tracks.

- c. Pepper Avenue Extension – This project is stalled due to Delhi Sand Loving Fly (an endangered species) habitat within the proposed project limits.

Most of the other projects listed are street widening and/or addition of lanes; the challenges for these projects are mostly right of way acquisition and funding.



































February 14, 2012

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

RE: Comments on the Drafts of the 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR)

Dear Mr. Ikhtrata:

For the past three years, business and industry representatives from throughout Southern California have participated in the Southern California Association of Government's extensive process used to develop the region's Draft 2012 Regional Transportation Plan (RTP), which includes an inaugural Sustainable Communities Strategy (SCS). Our interest in this process has been particularly keen given both the significant economic challenges currently facing our region's economy and the fact that the inaugural SCS could – if not considered from many viewpoints – have unforeseen negative consequences.

In light of our ongoing participation and understanding, we appreciate the tremendous effort that SCAG's staff and leaders have put into the process that led to the Draft 2012 RTP/SCS & PEIR. The development of this RTP/SCS followed an inclusive approach with SCAG holding hundreds of meetings with SCAG's public and private stakeholders. We also appreciate the extensive economic analysis that SCAG has performed on the Draft RTP/SCS in order to provide all stakeholders and SCAG's Regional Councilmembers with an understanding of the financial impacts of the plan.

As representatives of Southern California's broader business community, we recognize the crucial roles that transportation and infrastructure have in maintaining our region's economy and quality of life. Accordingly, through this letter, we join together to provide SCAG with general comments regarding remaining significant concerns about the contents of both (i) the Draft 2012 RTP/SCS, and (ii) the Draft Program Environmental Impact Report (PEIR).

From the beginning, representatives of businesses and industries have agreed upon the qualities of a good RTP/SCS. Those qualities can be summarized as follows. The RTP/SCS should:

- Foster economic growth and job creation in a balanced and accountable manner and in recognition of foreseeable regional population growth;
- Utilize all revenue sources very efficiently, and utilize new revenue sources only if they are economically sound and equitable;
- Honor the prerogatives that local governments – as the level of government with the greatest understanding of and sensitivity to community interests and context – should continue to enjoy concerning land use and community development;
- Comply with the California Environmental Quality Act (CEQA) and federal environmental laws and regulations (e.g., federal Clean Air Act conformity); and
- Allow for expeditious review and approval of projects that are consistent with a sound and reasonably accommodating RTP/SCS.

Despite our overall appreciation for the work put in by SCAG's staff, there are important aspects of the Draft 2012 RTP/SCS and Draft PEIR which, we believe, require much more consideration and correction or clarification before SCAG approves the 2012 RTP/SCS and the Final PEIR. Corrections – or at least substantial clarifications – are needed in order to bring the Final 2012 RTP/SCS and PEIR back into line with the principles set forth above.

Stated here in the most general terms, SCAG's staff and ultimately its Regional Council should address the following concerns and correct the final 2012 RTP/SCS and the accompanying PEIR.

- 1) The Draft PEIR is unduly prescriptive and imposes mitigation requirements that are not suitable for mandatory consideration at the individual project level. Simply put, many of the prescribed mitigation measures address matters at too small a scale for a regional transportation and land use strategy. The Draft PEIR lists more than 500 discrete mitigation measures that cover a broad range of topics; and it asserts that SCAG has preliminarily found that all such mitigation measures are feasible and “can and should” apply to all future projects in the region. Many of these mitigation measures were drawn from “model policies” that were drafted in 2009 and were intended for consideration only at a jurisdictional planning level – not an individual project level. Many of the mitigation measures listed are not reasonably considerable – let alone feasible – generally at a project level throughout Southern California.
- 2) Many of the mitigation measures set forth in the Draft PEIR have no relationship to the RTP/SCS or its impacts. For example, the Draft PEIR invokes mitigation measures ranging from low-flow toilets to green roofs. Such mitigation measures have nothing to do with the regional dispersion of future development and redevelopment or its indirect effects on emissions from vehicular use (which is the proper focus of the RTP/SCS).
- 3) The Draft PEIR attempts to etch in stone the project-level consideration and potential incorporation of mitigation measures that conflict with, or inevitably will conflict with, highly-evolved and dynamic subject-matter regulations. For example, the Draft PEIR would prescribe mitigation requirements concerning matters ranging from storm water management to energy efficiency standards to fire protection to landscaping to water supply analyses – all matters that are highly regulated and subject to dynamic standards that either are now or are bound to be at odds with the PEIR.

In light of the above-stated problems with the Draft PEIR, we believe that it needs to be substantially rewritten to clarify what we understand was intended by SCAG's staff and leaders – that the PEIR should not subtract from or interfere with local governments' reasonable prerogatives under CEQA. As the Draft PEIR now stands, the environmental analysis and suggested mitigation requirements would likely lead to more CEQA litigation rather than to CEQA streamlining as California Senate Bill 375 (2008) promised.

Turning to the substance of the RTP/SCS as a policy matter, we have the following additional general comments:

- 4) The RTP/SCS is undergirded by analysis which shows the dispersion of populations and employment shown and categorized at the level of sub-jurisdictional “transportation analysis zones” (TAZs). The TAZ level of detail is, we believe, too small and precise a level at which to prescribe the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. Page 148 of the SCS should therefore be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or sub-regional level, not at a TAZ level.
- 5) The RTP/SCS should aim to reflect and accommodate both the short-term future of the SCAG region and its long-term future. For example, the RTP should better anticipate the need for and reasonable likelihood of a gradual transition in the region’s overall vehicle fleet (e.g., gradually towards alternative fuels) and the ongoing need for enhancements to vehicular mobility even as more mass transit comes to fruition.
- 6) More detail, clarity and explanation are needed concerning the new revenue sources that are outlined within the plan document. New revenues account for \$219.5 billion out of the total \$524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS).  
To fully and fairly evaluate these proposals, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following:
  - a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.
  - b. The new revenue sources within the RTP must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.
- 7) New revenues from fees on businesses operating in the SCAG region – and particularly the “Freight Fee/National Freight Program” listed on page 96 of the Draft RTP – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region’s competitiveness will be compromised.
- 8) In the RTP, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system. It would be helpful for SCAG to state clearly in the RTP that, to date, stakeholders have not reached consensus on technologies, timing, funding, or emissions impacts of the various options that SCAG examined in the RTP. For example, SCAG discusses long-term steps towards a “Zero Emissions Container Movement System” (ZECMS). If SCAG chooses to pursue such a fundamental shift in new technology, it would need to work with all goods movement stakeholders to clearly establish whether and, if so, when and where within the transportation infrastructure a ZECMS option could be demonstrated and evaluated without negatively effecting the velocity and throughput of the system.
- 9) With the recent elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is challenged, given the costs related to aging or inadequate infrastructure capacity and high development costs for higher density projects. The elimination of redevelopment agencies also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. In fact, since the passage of SB 375, the State of California has stripped local governments of funds that were previously available for

transit, transportation and redevelopment. This follows many years in which the state diverted revenues from gasoline, sales, income and other taxes needed for local government programs. Local governments cannot help to fulfill the 2012 RTP/SCS without increased, not decreased, state support. SCAG should emphasize the need for the state to restore support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to speed the attainment of mandated goals.

While we find many very positive aspects in the plan, especially related to principles and direction, these significant issues need to be addressed. The short list of general concerns set forth above is not meant to be exhaustive. Many of the organizations that subscribe to the above-stated comments will be commenting more robustly in separate writings. We join here, however, to express our unity in finding the Draft 2012 RTP/SCS and PEIR to be in need of significant clarification and correction. We are also jointly committed to completing this process and, over the remaining weeks, working closely with SCAG to develop and adopt a smart, flexible, accountable, and economically sound RTP/SCS.

Respectfully,



Jim Clarke  
Executive Director  
Apartment Association of Greater Los Angeles (AAGLA)



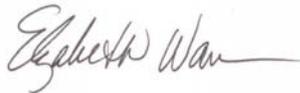
Andrew R. Henderson  
Vice President and General Counsel  
Building Industry Association of Southern California, Inc.



Heidi L. Gallegos  
Executive Director  
Eastvale Chamber of Commerce



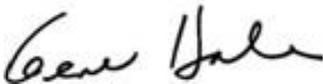
Hilary Norton  
Executive Director  
FAST – Fixing Angelenos Stuck in Traffic



Elizabeth Warren  
Executive Director  
FuturePorts



John Kelsall  
President & CEO  
Greater Lakewood Chamber of Commerce



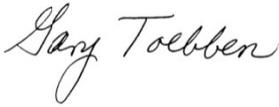
Gene Hale  
Chairman  
Greater Los Angeles African American Chamber



Paul C. Granillo  
President & CEO  
Inland Empire Economic Partnership



Joeann Valle  
Executive Director  
Harbor City/Harbor Gateway Chamber of Commerce



Gary Toebben  
President & CEO  
Los Angeles Area Chamber of  
Commerce



David Fleming  
Founding Chairman  
Los Angeles County Business  
Federation



Hugo W. Merida  
Chairman of the Board  
Los Angeles Metropolitan Hispanic  
Chamber of Commerce



Kate Klimow  
Vice President of Government Affairs  
Orange County Business Council



T.L. Garrett  
Vice President  
Pacific Merchant Shipping  
Association



Sandy Cajas  
President & CEO  
Regional Hispanic Chamber of  
Commerce



Rich Lambros  
Managing Director  
Southern California Leadership  
Council



Ron L. Wood  
President & CEO  
The Valley Economic Alliance



Stuart Waldman  
President  
Valley Industry & Commerce  
Association (VICA)



Patty Senecal  
Manager, Southern California Region  
and Infrastructure Issues  
Western States Petroleum Association



Michael W. Lewis  
Senior Vice-President  
Construction Industry Air Quality  
Coalition (CIAQC)



Michael W. Lewis  
Senior Vice-President  
Construction Industry Coalition on  
Water Quality (CICWQ)



Alexander Pugh  
Senior Project Manager - Policy &  
Project Management  
Southern California Edison



Bill Allen  
President & CEO  
Los Angeles County Economic  
Development Corporation



John Guerra  
Director, Regional Public Affairs  
SoCalGas



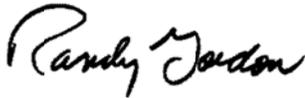
Michael Carroll  
Regulatory Flexibility Group



Madame M C Townsend  
President & CEO  
Regional Black Chamber of  
Commerce – San Fernando Valley



Bob Amano  
Executive Director  
Hotel Association of Los Angeles



Randy Gordon  
President/CEO  
Long Beach Area Chamber of  
Commerce



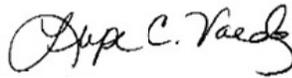
Jay McKeeman  
Vice President, Government  
Relations & Communications  
California Independent Oil  
Marketers Association (CIOMA)



Christina Davis  
President & CEO  
LAX Coastal Chamber



LaDonna DiCamillo  
Senior Manager Government Affairs  
BNSF Railway



Lupe Valdez,  
Director of Public Affairs  
Union Pacific Railroad

*Fred Johring*

Fred Johring  
President  
Harbor Trucking Association



Eric Sauer  
Vice President Policy and Regulatory  
Affairs  
California Trucking Association



February 14, 2012

Ryan Kuo  
Transportation Planner  
Southern California Association of Governments  
818 West 7th Street  
12th Floor  
Los Angeles, CA 90017

RE: Comments to 2012 Regional Transportation Plan (RTP) Draft

Dear Ryan:

DesertXpress Enterprises, LLC appreciates the opportunity to provide comments to the 2012 RTP. Enclosed is a comment matrix indicating the volume, page number and suggested revision. Should you have any questions regarding the DesertXpress project or the comments provided, please feel free to contact me at (702) 739-2020.

Best Regards.

A handwritten signature in black ink, appearing to read 'Andrew Mack', written in a cursive style.

Andrew Mack  
Chief Operating Officer  
DesertXpress Enterprises, LLC

Encl. As stated



**SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS ("SCAG")  
2012 REGIONAL TRANSPORTATION PLAN - DRAFT  
COMMENTS SUBMITTED BY DESERTXPRESS ENTERPRISES, LLC  
FEBRUARY 14, 2012**

<b>DOCUMENT</b>	<b>PAGE #</b>	<b>SECTION</b>	<b>PROPOSED REVISION</b>
Chapter 1: Vision	21	Passenger and High Speed Rail	Request adding a discussion of DesertXpress. Although included in the Strategic Plan, as a federally licensed and approved interstate passenger railroad, DesertXpress will help to achieve the vision for high speed passenger rail in Southern California.
Chapter 2: Transportation investments	44	Strategically Expanding Our System	Suggest adding language describing that by diverting automobiles, high speed rail increases the goods movement capacity of the freeway system.
Chapter 2: Transportation investments	50	Passenger and High Speed Rail	Request adding that a connection to the DesertXpress system between Victorville and Palmdale would effectively expand passenger rail service providing interstate high speed rail connectivity.
Chapter 2: Transportation investments	52	Rail Policies	Suggest adding language to explain that DesertXpress is committed to building an interoperable system and welcomes the support of SCAG in working with us to ensure that interoperability between systems is achieved.  The MOU between SCAG, LAMETRO, CAHSRA, SANBAG, SANDAG etc. should be referenced.
Chapter 4: Sustainable Communities Strategy	106	Table 4.4: Transportation Network Actions and Strategies	Suggest including language in table to encourage connectivity with DesertXpress.
Chapter 7: Strategic Plan	201	Long-Term Emission Reduction...	Suggest adding electrified passenger rail in addition to freight rail as a strategy for emission reduction.

DOCUMENT	PAGE #	SECTION	PROPOSED REVISION
Chapter 7: Strategic Plan	204	Ultimate Vision for a High-Speed Rail System	<p>Suggest adding more detail regarding DesertXpress.</p> <p>DesertXpress is a Federally approved and licensed high speed passenger railroad that connects Las Vegas with Southern California. With its Southern California station initially in Victorville, an extension of DesertXpress to Palmdale, 50 miles West, would provide for a cross platform connection to the Metrolink commuter rail system with station stops throughout Southern California. Fully interoperable high speed service would be achieved over the California high speed rail project or upgraded Metrolink system. Environmental work has already begun to analyze and clear the rail connection between Victorville and Palmdale as part of the High Desert Corridor project. The High Desert Corridor Joint Powers Authority (comprising San Bernardino County, Los Angeles County, City of Adelanto, City of Hesperia, City of Palmdale, and City of Victorville) passed resolutions of support for DesertXpress in May 2010 and June 2011.</p> <p>The DesertXpress project specific EIS is complete with the following Federal actions:</p> <p>July 8, 2011: Federal Railroad Administration Record of Decision (ROD)</p> <p>October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity.</p> <p>October 31, 2011: Bureau of Land Management ROD</p> <p>November 18, 2011: Federal Highway Administration ROD</p> <p>On December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land.</p> <p>Application for a federal loan under the Railroad Rehabilitation and Improvement Financing program currently under review by US Department of Transportation.</p>
Supplemental Report: Aviation and Airport Ground Access	112	2.3.2 Role of California High-Speed Rail System in Regional Airport Ground Access	Suggest adding discussion of potential for DesertXpress connection at the Palmdale Airport.

DOCUMENT	PAGE #	SECTION	PROPOSED REVISION
Supplemental Report: Passenger Rail	8	Table 2: High Speed Rail Matrix	<p>Suggest revising as follows:</p> <p>PROJECT: DesertXpress</p> <p>PROJECT DESCRIPTION: Las Vegas to Victorville with no intermediate stops generally along I-15 corridor. Phase 2 would connect Victorville with Palmdale. Top speed of 150 MPH using Tier III compliant electric multiple unit trains.</p> <p>PROJECT READINESS: Project specific EIS is complete and federal interstate operating license has been issued. July 8, 2011: Federal Railroad Administration Record of Decision (ROD). October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity authorizing DesertXpress as an interstate railroad. October 31, 2011: Bureau of Land Management ROD. November 18, 2011: California and Nevada Federal Highway Administration RODs. December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land.</p> <p>PROJECT CONSENSUS: High - as evidenced by the completed NEPA process, agreements in place with the State of California, Certificate of Public Convenience and Necessity from the Surface Transportation Board, support from Victorville, San Bernardino County, Los Angeles County, City of Adelanto, City of Hesperia, City of Palmdale, the Las Vegas Convention and Visitors Authority, and Clark County, NV.</p> <p>REGIONAL CONNECTIVITY: Good - initially with proximity to Amtrak station in Victorville. Connection to Palmdale would provide for a connection to Metrolink and ultimately to California High Speed Rail.</p> <p>RIDERSHIP POTENTIAL: Sufficient to cover all operating and capital costs.</p> <p>COST: \$6.5 billion.</p> <p>FUNDING: Federal loan and private debt/equity.</p> <p>BUSINESS PLAN: Ridership and revenue report completed for loan application but not yet available.</p> <p>COMMUTER RAIL POTENTIAL: Extension to Palmdale would serve commuter market well.</p> <p>STAFF RECOMMENDATION: Include in Strategic Plan.</p>

DOCUMENT	PAGE #	SECTION	PROPOSED REVISION
Supplemental Report: Passenger Rail	18	the Strategic Plan: Our Ultimate Vision for High Speed Rail	Suggest adding DesertXpress and connection to California High Speed Rail and upgraded Metrolink service as a key component of the Ultimate Vision for High Speed Rail.
Supplemental Report: Passenger Rail	19	Strategic Plan Projects	<p>DesertXpress is a Federally approved and licensed high speed passenger railroad that connects Las Vegas with Southern California. Travelling between Las Vegas, NV and Victorville, CA at a top speed of 150 MPH, DesertXpress will use next generation steel wheel on steel rail fully electric high speed trains. There are no intermediate stops.</p> <p>The DesertXpress project specific EIS is complete:</p> <ul style="list-style-type: none"> <li>• July 8, 2011: Federal Railroad Administration Record of Decision (ROD)</li> <li>• October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity.</li> <li>• October 31, 2011: Bureau of Land Management ROD</li> <li>• November 18, 2011: Federal Highway Administration ROD</li> <li>• On December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land.</li> </ul> <p>With its Southern California station initially in Victorville, an extension of DesertXpress to Palmdale, 50 miles West would provide for a cross platform connection to the Metrolink commuter rail system with station stops throughout Southern California. Fully interoperable high speed service would be achieved over the California high speed rail project or upgraded Metrolink system. Environmental work has already begun to analyze and clear the rail connection between Victorville and Palmdale as part of the High Desert Corridor project. The High Desert Corridor Joint Powers Authority (comprising San Bernardino County, Los Angeles County, City of Adelanto, City of Hesperia, City of Palmdale, and City of Victorville) passed resolutions of support for DesertXpress in May 2010 and June 2011.</p> <p>Application for a federal loan under the Railroad Rehabilitation and Improvement Financing program currently under review by US Department of Transportation.</p>

Per our correspondence to Mr. Ikhata dated 2/14/2011 regarding the Draft 2012 Regional Transportation Plan (RTP), we would like to request modifications to the draft RTP project list for the following projects:

Page	Agency	RTP ID	Requested Change
Page 238	RCTC	3CR0702	Revise project description to remove PVL station at Hemet Airport and replace with station near new SR-79 alignment and Stetson Rd.
Page 239	RTA	3TC04TR6	Change the project description to “Construct new Hemet Transit Center (with approximately 4 bus bays) in the vicinity of State St and Devonshire Ave near the future courthouse location. Change the project location from Menifee to Hemet. Change the completion year from 2027 to 2015, and update the total project cost from \$5,926 to \$1,442.
Page 240	RCTC	3C01MA03	Change project description to “CETAP – Riverside County to Orange County – Construct new intercounty transportation Corridor A – 2 toll each dir on new facility parallel to SR-91, from from SR-241 to I-15, with IC at SR-241, SR-71, I-15”. Network year remains 2035. Update total project cost to \$2,720,000.  Move balance of project description “CETAP – Corridor B – 2 toll each dir on new facility from I-15/Mid-County Pkwy to SR-241/SR-133” to Strategic Projects Section.
Page 266	Coachella	3A07094	This is currently programmed as FTIP ID RIV071246. Network year should remain 2018 (previously requested to change to 2020). Update total project cost from \$4,853 to \$22,290.
New Project	RTA		Regional transit center for mass transit service in central western Riverside County along I-215 corridor. Network year is 2030 and the total project cost is \$10M.

We would like to request modifications to the project list that we have submitted to SCAG staff through the standard RTP long-range project list modification and FTIP database update processes:

**Major project modifications have been submitted for the following RTP projects:**

3A07262	3A01CV068	3TR04C
3A07205	3A07001	3TR04A, 3TR04B
3A07207	3120014	3ITS09
3A07024	3A01CV071	3TL1507
3A07040	3A07101	3TL1607
3A07069	3A07292	3TL1107
3A07088	3A01CV076	3TC04TR1
3120008	3A01CV075	3TC04TR10
3A01CV047A	3A01WT210	3TC04TR6
3A01CV047B	3A04WT187	3TC04TR8
3A01CV049	3A01WT045	3TC0702
3A01CV048	3A04WT046	3A01CV098
3A07074	3A01WT218	3120007
3A07031	3A04A22	3A01CV002
3ITS08	3A04WT198	3A04CV113
3A01CV123	3A01CV085	3A01CV004
3A01CV111	3A01CV086	3A01CV014
3A07018A	3A07097	3A07094
3A01CV104	3A07244	3A07164
3A01CV105	3A07079	3A07165
3A01CV103	3120012	3A01CV017
3120010	3A04WT078	3A07011
3A01CV060	3M01CV01	3A01CV018
3A01CV059A	3M0715	3A01CV016
3A01CV061	3M0702	3A01CV023
3A01CV063	3M01CV03	3A04CV027
3A04A25	3M0716	3A07078
3A07266	3M0708	3A07137
3A04WT165	3M0722	3A07029
3A01CV067	3TL504	3120004

**Major project additions have been submitted for the following RTP projects:**

3120015	3120021	3120030
RIV111201	3120022	3120031
3120016	3120023	3120032
RIV111131	3120024	3120033
3A04WT198B	3120025	3120034
3120017	3120026	3120035
3120018	3120027	RIV071250B
3120019	3120028	RIV050531
3120020	3120029	RIV071241

**Major project deletions have been submitted for the following RTP projects:**

3A07109 (project complete)  
 3A04WT070  
 3A01WT036 (project complete)  
 3A01WT035 (project complete)  
 3A07076  
 3M01WT021  
 3TK04MA13 (programmed as RIV120201 in 2011 FTIP A24)  
 3M04WT009 (programmed as RIV091012 in 2011 FTIP A24)

**Major project changes were submitted as part of 2011 FTIP A24:**

RIV071247	RIV62029
RIV031209	RIV091008 (3A07131)
RIV071253	RIV060111
RIV071267	RIV100107 (3M10WT03)
RIV050532	RIV091012 (3M04WT009)
RIV071250	RIV100104 (3M0725)
RIV090902 (3M0803)	RIV060114
RIV520109	RIV110825
RIV091007 (removed from A24)	RIV031218
RIV090622	RIV080917 (3A07155)
RIV071252 (3A07020)	RIV080918 (3A07156)
RIV071254 (3A07022)	RIV031209
RIV62034	RIV050535
RIV120201 (3TK04MA13)	RIV120202 (replaced with RIV090902)

**Additional Comments:**

Page	Agency	RTP ID	Comment
Page 83	Lake Elsinore	RIV091007	This project is not reflected in the Financially-Constrained RTP Projects list – please confirm project is modeled.
Page 90	Palm Springs	RIV090402	This project is not reflected in the Financially-Constrained RTP Projects list – please confirm project is modeled.

<b>Page</b>	<b>Agency</b>	<b>RTP ID</b>	<b>Comment</b>
Page 243	Riverside County/Indio	0	Programmed as FTIP ID 47520 (I-10/Jefferson IC).
Page 250	Moreno Valley	3M0712	Programmed as FTIP ID RIV080902.
Page 251	Moreno Valley	3M0801	Programmed as FTIP ID RIV080904.
Page 252	Coachella	3M0717	Programmed as FTIP ID RIV071274.
Page 255	RCTC	3M0738	Programmed as FTIP ID RIV110122.
Page 272	Moreno Valley	3A10WT01	Programmed as FTIP ID RIV091004.
Page 272	Riverside County	3A04WT137A	Programmed as FTIP ID RIV090903. Verify that project is modeled.
Page 280	Moreno Valley	3A01WT053	Programmed as FTIP ID RIV080908.
Page 286	Moreno Valley	3A04WT056F	Programmed as FTIP ID RIV080915.
Page 287	Moreno Valley	3A0805	Programmed as FTIP ID RIV080917.
Page 291/2	Rancho Mirage	3A07116/3A07128	Programmed as FTIP ID RIV091010.

Director  
Water Resources Institute  
California State University  
San Bernardino



[REDACTED]  
[REDACTED]  
San Bernardino, CA [REDACTED]

Date: February 14, 2012  
To: Southern California Association of Governments <http://www.scagrtp.net/>  
Re: Public Comment to SCAG Regional Transportation Plan

As a former SCAG Regional Council Member that served during the time I was a member of the San Bernardino City Council from 1998-2006, I had the opportunity to work closely with previous Regional Transportation Plan (RTP) implementation efforts. I continue to remain engaged as a private citizen in issues of importance to Southern California. Thank you for the opportunity to submit my public comment by email.

In the last RTP, there was a concept similar to the current GRID (Green Rail Intelligent Development) to which there was no progress during implementation. I am writing to express my desire that this Southern California alternative to Goods Movement be once again included in the current RTP.

The GRID alternative, which proposes the installation of 15-ft. water-tight pipelines housed in an unmanned electrified rail guide way, has a number of advantages for traversing goods from the Ports of Los Angeles and Long Beach to the inland regions of California.

- First, installation of an underground pipeline would employ installation that is identical to the installation of water pipelines that use only a “cut and cover” technique which environmentally presents much less adverse impacts.
- Furthermore, this project holds the potential of creating many jobs in Southern California during the manufacturing and construction of the system because materials proposed in GRID are already manufactured locally.
- Finally, I believe that including an alternative Goods Movement concept that would be powered by electricity, rather than diesel, is good public policy. As a resident of San Bernardino, the concept of moving Port freight through an underground pipeline that would ultimately emerge at an Inland Port holds the promise of someday reducing the truck traffic that is affecting so many of Southern California’s Disadvantaged Communities where rail and existing roadways traverse and gravely impact the respiratory health of our children and seniors who have been shown to be disproportionately affected by goods movement.

For those reasons, I urge SCAG to include the GRID alternative in the current RTP providing the opportunity to further examine a concept without any significant impact to air quality as is found in existing rail shipments or container movement by diesel-powered semi trucks.

I look forward to hearing the Regional Council has included the GRID (Green Rail Intelligent Development) as an alternative Goods Movement Alternative. Thank you.

**Sustainability Committee, Los Angeles Section  
American Society of Civil Engineers  
Comments on December 2012 draft of  
SCAG 2012 Regional Transportation Plan**

The Southern California Association of Governments' (SCAG) 2012 Regional Transportation Plan (Plan) is an excellent planning document based on 2005 technology. It lacks only an update for the digital technology of 2010 and an infusion of hope amid the many challenges. You can accomplish that update by inserting the **Arial font** text at the appropriate locations in the Plan. Any text not in **Arial font** is supporting logic and documentation. SCAG may choose to insert the non-Arial font or use it to prepare an alternate revenue-expense model.

SCAG is a sufficiently large economy to drive more applications of digital technology for transportation safety and convenience. If SCAG does not drive digital applications, the digital applications will drive SCAG. For example:

- In response to youth surveys, General Motors is applying digital technology. For example; small self-driving taxis and cars which will park themselves a mile or more from their passenger drop off or pick up locations.<sup>1,2</sup> Today's tech-savvy 0-15-year olds will be the transportation consumers responding (or not) to SCAG's Transportation Demand Management (TDM) as the 18-38-year olds of 2030.
- Drivers are ever more distracted by their digital devices, so much so the National Highway Traffic Safety Administration recommends banning all use of digital devices, even hands free phones.<sup>3</sup> Increasingly distracted drivers are more likely to kill pedestrians and bicyclists, with more adverse impacts on TDM and safety.<sup>4</sup>
- Pedestrians and bicyclists are distracted reading their digital device and oblivious to outside sounds wearing earphones.<sup>5</sup>
- As of 2009, anyone with a smart phone had access to real-time (and very distracting) visual indications of traffic conditions on their alternate routes.

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<sup>1</sup> Self-parking is described in News Briefs, page 36, *Civil Engineering*, December 2011 (*Civil Engineering* is the magazine of the American Society of Civil Engineers). The POD car is described at <http://theweek.com/article/index/217867/gms-new-self-driving-pod-car>.

<sup>2</sup> General Motors is responding to numerous surveys, "Young buyers want cars that are safe, affordable, compatible with the latest high-tech gadgetry, and good for the environment." In 1983, 80% of 18 year olds had driver's licenses, in 2008 only 67%.

<http://www.vcstar.com/news/2012/jan/12/editorial-job-1-is-getting-teens-interested-in/>

<sup>3</sup> Associated Press, December 17 & 18, 2011 based on NHTSA campaign <http://distraction.gov/>

<sup>4</sup> Individual car safety/convenience features (adaptive cruise control, self-parking, stability control, out-of-lane warning, etc.) are less likely to sense pedestrians while giving drivers a false sense of safety while distracted.

<sup>5</sup> Editorial in Ventura County Star, December 29, 2011 mentioning the National Transportation Safety Board, the American College of Emergency Physicians, the San Francisco Municipal Transportation Agency, and AAA Texas.

The American Society of Civil Engineers, Los Angeles Section, Sustainability Committee encourages SCAG to drive digital applications for transportation because digital applications allow tremendous improvements in mobility, safety, and air quality with relatively little use of the Earth's natural resources.

Further, motor vehicles manufacturers are implementing digital applications in an uncoordinated fashion motivated to sell more vehicles: adaptive cruise control, stability control, self-parking, voice recognition, collision warning, General Motors' OnStar, etc. While these systems help protect the vehicle occupants, they are likely to increase the rate of bicyclist and pedestrian deaths above 21%.<sup>6</sup> Our committee includes regular bicycle commuters who often get unsolicited comments about the dangers involved. It would seem the perception of danger is discouraging bicycle and pedestrian transportation. It follows that an increase in perceived safety is essential for increasing active transportation.

## **Executive Summary**

After the Mobility, Safety, Air Quality, and Financial Challenges of Executive Summary pages 2 and 3, add:

### **DIGITAL OPPORTUNITIES**

Our electronic systems continue to improve in reliability, performance, and cost. 2035 is as far in the future as 1986 is in the past. In 1986, mobile phones were the size of small vacuum cleaners and anti-lock brakes were standard on a few luxury cars. Personal computers were the size of a desk drawer with the power to handle word processing and simple spreadsheets. In 2010, smart phones are smaller than a deck of cards, are a tenth the cost of a 1986 personal computer, and possess the power of a 1986 super-computer. Full drive-by-wire stability control systems are standard on most cars. The global positioning system (GPS) was not fully operational with civilian accuracy of about 30 feet until 1994. In 2010, smart phones have GPS which can be integrated with the smart phone's accelerometers for precision of a few inches at highway speeds.<sup>7</sup>

Our vision includes pushing the connectivity and computing power of 2010 to address the transportation challenges of 2020, 2030, and beyond.

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<sup>6</sup> The December 2011 draft 2012-2035 Plan, page 2.

<sup>7</sup> Differential, Wide Area Augmentation, Local Area Augmentation, and multiple signals increase accuracy. The differential GPS position accuracy of an object which is still for minutes is fractions of an inch. The accelerometers allow moving objects to integrate GPS signals over time to achieve accuracy within several inches and to cover areas with spotty GPS signal reception.

At the end of the Financial Plan Executive Summary pages 7 and 8, add:

## **REDUCED INSURANCE COSTS**

Drivers and businesses in the SCAG region paid about \$25 billion in 2010 for vehicle insurance.<sup>8</sup> By pushing digital systems to address transportation safety challenges, SCAG can decrease collisions from about 83,000 per year in 2010 to less than 500 per year in 2035.<sup>9</sup> Digital systems would save drivers and businesses about \$240 billion on insurance premiums over the twenty years between 2015 and 2035.<sup>10</sup> Also, by pushing digital systems to address transportation mobility challenges, SCAG can reduce the regional person-hours of traffic delay below 1 million hours per year.<sup>11</sup> The insurance and time savings more than justify the increased gas tax<sup>12</sup> and mileage-based user fee suggested in Table 2 with directly offsetting savings for drivers and business.<sup>13</sup>

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<sup>8</sup> An estimate based on proportionality of population SCAG may want to verify.

<sup>9</sup> The modest drop in collisions per year shown in Figure 2.2, page 38 may be due as much to the economy and the increased prevalence of stability control systems than California's Strategic Highway Safety Plans. Extending digital systems beyond drive-by-wire stability control promises near-zero collisions.

<sup>10</sup> It is possible for 99% of vehicles to have digital zero-collision systems by 2035. A linear ramp-down of accidents and insurance costs starting in 2015 would extend over twenty years with an average saving (predicted for 2025) of \$12 billion per year.

<sup>11</sup> The December 2011 draft Plan's Figure 6.1 on page 164 indicates essentially no change from 2008's time lost to traffic delays for the Plans' 2035 projection of about 4 million hours/yr. Because digital systems are super-polite (the cars are informing each other of moves well within digital reaction times) merging is smoother and per-lane capacity at speed is easily doubled. The smooth merging feature should be effective eliminating traffic delays even beyond the effective doubling or tripling the number of lanes. While actually doubling lanes or buses or trains is not fiscally possible, virtually doubling them is as inexpensive as \$200 per vehicle per a 2005 estimate by General Motors engineers.

<sup>12</sup> Overall sustainability would be better by either 1) shifting the per-mile fee to fuel tax or 2) implement the per-mile fee as a function of vehicle weight. As a commuting bicyclist I might pay 1/20<sup>th</sup> the rate of a Smart Car, who would pay 1/4 the rate of an SUV, who would pay 1/6<sup>th</sup> the rate of a loaded semi-truck. Bicyclists and pedestrians could pay toward a lottery-type incentive system as combination virtual force field and bicycle computer device logs commuting miles.

<sup>13</sup> The December draft Plan indicates substantial new revenue to preserve essentially the same traffic delay and a modest decrease in vehicle insurance costs. "Same as 2008" will not keep the Ports of Los Angeles and Long Beach competitive with a widened Panama Canal or help the SCAG region attract other businesses while other regions improve their transportation and drop their expenses applying digital systems.

## Vision

Change the title and add the following to pages 27 and 28:

### INTEGRATED LAND USE AND DIGITALLY ENHANCED TRANSPORTATION

Digitally enhanced transportation is the application of technology allowing:

- Transit users to keep shopping, working, or playing until they receive an alarm that they have just enough time to get to the bus stop.
- Bus drivers to vary their routes and stops in real time to optimize service, revenue, and expense.
- Cities to organize all the possible parking spots (street, schools, churches, business, and individual residences) for public-private coordinated time-of-use and membership-based tolls and space sharing.<sup>14</sup>
- Private drivers and passengers to share rides on-the-fly as a decentralized neighbor-helping-neighbor form of transit.
- Pedestrians and bicyclists to be protected from motor vehicles by a virtual force field using a \$50 device which informs motor vehicles of their location, velocity, and accelerations. The same device can offer tips on safe bicycling and safe walking.<sup>15</sup>
- Motor vehicles to be protected by the same virtual force field. The virtual force field not only prevents accidents, it negates the perceived safety of larger vehicles.<sup>16</sup>
- More gamification<sup>17</sup> in traffic management, such as speed camera lottery.
- Safely doubling road capacity while maintaining the speed limit (no congestion delays) by applying the same virtual force field to make vehicles super-polite.
- Rental of bicycles, traditional cars, or self-driving vehicles by the minute.<sup>18</sup>
- Cargo-pooling for mail, hardcopy messages, tools, equipment, food, etc.<sup>19</sup>

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<sup>14</sup> (We may find excess parking spaces to convert into mini-parks or weekly/seasonal business locations.)

<sup>15</sup> (Bicycle on the right! *Spanish translations welcome.* Stop for red light! Cross curbs at right angles.)

<sup>16</sup> The perception of safety in small vehicles allows the proliferation of Smart Car sized vehicles and even freeway capable human-electric hybrids.

<sup>17</sup> Gamification is applying games to life (transportation, education, government, etc.).

Gamification and speed camera lottery are explained at: [http://www.aol.com/video/youve-got-gabe-zichermann/517241772/?icid=maing-grid7%7Cmain5%7Cvideo-module%7Csec3\\_Ink1%7C125198](http://www.aol.com/video/youve-got-gabe-zichermann/517241772/?icid=maing-grid7%7Cmain5%7Cvideo-module%7Csec3_Ink1%7C125198).

<sup>18</sup> Many cities already have bicycle rentals by the minute from a multitude of locations spread around the city, one example: <http://www.bcycle.com/>. General Motors is developing two-person self-driving, self-parking, digitally summoned electric vehicles:

<http://theweek.com/article/index/217867/gms-new-self-driving-pod-car>. Private companies are offering hourly car rentals, one example: <http://www.zipcar.com/>.

<sup>19</sup> With convenient communications and radio ID tags, a U.S. Postal Service tractor could connect with a preloaded trailer full of store-assembled boxes of groceries, and deliver each box to the apartment which ordered those groceries. See <http://www.prweb.com/releases/2011/10/prweb8844077.htm>

### **Background information on decentralized transit and parking**

Smart phone-transit<sup>20</sup> is by far the most business like way to reduce vehicle miles. With smart phone-transit, everyone can elect to participate public transit, which is as time conserving as hailing a taxi and as energy and cost conserving as carpooling. That is, the public transit via smart phone is super-convenient relative to buses or trains. There are many examples. This software for i-phones is a ridesharing focused explanation of smart phone-transit: [www.avego.com/ui/index.action](http://www.avego.com/ui/index.action). This app can work on any smart phone.

Cellphone-parking<sup>21</sup> guides people to empty parking spaces and enhances many other strategies for increasing ridership on traditional and new forms of public transit.

Two non-profits have included smart phone-transit in their documents. Santa Barbara's Community Environmental Council describes it as dynamic ridesharing coordinated with smart phones in their 2007 Transportation Plan for their Fossil Free by 2033 Program. Sierra Club California mentions making transportation information available with smart phones in their November 19, 2008 comment on the California Air Resources Board's (CARB) scoping plan for California's Global Warming Solutions Act of 2006.

### **Motivation**

The author's research for the Santa Barbara Community Environmental Council's Fossil Free by 2033 Transportation Plan (Free by 2033 Plan) confirmed a strong preference for convenience when selecting transportation. The Free by 2033 Plan<sup>22</sup> concludes increased ridesharing can reduce vehicle miles by 20% much quicker and less expensively than can increased use of traditional public transit. Convenience and cost factors strongly favor ridesharing.

These general facts from the Legislative Analyst's Office<sup>23</sup> concerning carpool lanes confirm a need to increase timesaving and convenience aspects of public transportation:

- High Occupancy Vehicle (HOV) lanes are underused in the off-peak direction or during off-peak hours, because there is little timesavings incentive to carpool when traffic is flowing.

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<sup>20</sup> Cellphone-transit uses the GPS, computer, and communications capabilities of cellphones to produce public transit by connecting people to share the empty seats in their cars.

<sup>21</sup> Cellphone-parking can have a sensor on each parking spot, or use individual's cellphones, or use the car's digital safety system as the sensor. In any case, the digital system would send information for billing, payment, guiding drivers to empty (non-reserved) spots, and gathering information on parking supply and demand.

<sup>22</sup> [http://www.communityenvironmentalcouncil.org/Programs/EP/PDFs/Transportation\\_Nov08/CEC\\_transportation\\_Nov08\\_final.pdf](http://www.communityenvironmentalcouncil.org/Programs/EP/PDFs/Transportation_Nov08/CEC_transportation_Nov08_final.pdf)

<sup>23</sup> Legislative Analyst's Office, "HOV Lanes in California: Are They Achieving Their Goals," January 2000

- HOV lanes are most effective when they provide timesaving. HOV lanes do not increase carpooling, unless there is traffic slowing congestion.

The summer 2008 high fuel costs followed by the fall 2008 low fuel costs provide a price-based example. High fuel costs increased bus and train ridership and prompted calls for more convenient buses and trains. At least in Los Angeles, new summer 2008 riders generally abandoned buses and trains when fuel prices dropped.

Further, consider how rapidly people abandon bicycles, buses, and trains when they can barely afford a private motor vehicle in developing countries. Witness the switch away from bicycles in China and India.

All this implies that transit riding must become as convenient as single occupancy vehicles if transit riding is to increase significantly. Rather than allowing traffic congestion to drag on the economy, make transit more convenient. The best transit riding increasing strategy will be super-convenient. The inexpensive super-convenience of digital applications extends to low income people unlike traditional public transit (which is not convenient) or single occupancy vehicle tolls (which are expensive). SCAG's implementation of smart phone-transit would make SCAG's transit system more sophisticated and 21st Century than New York, San Francisco, London or Paris.

#### Smart phone-transit & Smart phone-parking

Smart phones can coordinate and improve all our existing transportation equipment with:

- Convenient access to bus and train schedules and next-bus or next-train arrival times, even while you are standing at the curb;
- Automatic payment for train, bus, carpool, taxi, or rideshare (with demand-driven price adjustments honing in on the best price for minimum vehicle-miles);
- The convenient access to several modes of transportation makes traditional public transit more acceptable due to the easy on-the-fly availability of other modes to meet the unexpected.
- Carpools or rideshares scheduled weeks, days, hours, or minutes ahead, or even when a car is parked, or when a car with an empty seat is driving by;
- The smart phone warns you, routinely minutes before arrival, that a bus, train, or parking lot will be full. The warning could be days in advance when people are reserving for special events.
- Real-time ridesharing buddy selection (sometimes you want professional peers, sometimes church buddies, sometimes teammates);
- Navigation guidance to empty parking spots, paying the parking meter, parking meter rates that vary with time of day and number of people in the car;
- Rewarding with parking spots near the "in" restaurant for past public transit use, because the smart phone reliably documents time and distance spent commuting via public transit (or rideshare, or bicycle or walking);

- Businesses, churches, schools, employees, and individual citizen parking space owners could share parking spots with time-of-use metering and the rate communicated through and paid through the smart phone; and
- The smart phones may communicate using UC Berkeley developed software to direct individual drivers around traffic congestion. Again, the congestion can be predicted and prevented hours or even days in advance with sufficient people scheduling transportation on smart phone-transit.

Any smart phone with GPS (global positioning system) and modest computation power can have software more comprehensive than the i-phone application announced by Avego in November 2008. Other phone companies have been a little slower to acquire 3rd party transportation applications. However, the Blackberry Storm, the T-Mobile G1, the Samsung Instinct, and the LG Dare are all smartphones with touchscreens. They should be able to run smart phone-transit software.

The smart parking meters, most using Zigbee radio protocol, are already installed in several communities. San Francisco's SFPark project installed 6,000 meters in summer 2008.<sup>24</sup> Each meter is about the size of a deck of cards, is glued to the pavement, and has several years of battery life. The smart parking meters relay information to each other sometimes via similarly equipped electric, gas, and water meters. The communication allows car navigation to empty parking spaces and rate adjustment from a central office. The internal computer allows parking rates to vary for the convenience of the owner of the parking space and as a means to reduce vehicle-miles.

For example, a school could adjust the parking rate depending on location, time of day, how many students arrive in that vehicle on that day, how often that student has used other public transit or bicycled. A restaurant adjacent to the school could "rent" evening parking hours from the school with automatic payment validation when the people spend more than 20 minutes in the restaurant. Churches could "rent" parking spots for major sports events or nearby Christmas shopping because the parking rate for non-members would be exceptionally high during church events. One side effect of this coordinated parking is the opportunity to convert seldom-used parking into parks or bicycle lanes.

Other solvers will offer many strategies which are greatly enhanced by smart phone-transit and smart phone-parking: wireless web on buses and trains, rewarding employees to abstain from using a parking spot, subsidized bus passes, carpool lanes, time-of-use road tolls, emergency ride home, designated park&ride areas on every block, etc. You can find a great list of such ideas in the Santa Barbara Community Environmental Council's Transportation Plan<sup>3</sup>.

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<sup>24</sup> See website at SFPark.org. Check comments at <http://pressabout.us/sfpark.org>.

## Economics

As Avego proves, the only cost of providing smart phone-transit in the SCAG area is the cost of encouraging it's use and perhaps assisting Apple and other manufacturers to provide compatibility between smart phones and apps. The cost of smart phone parking is in establishing and maintaining a data base for the smart phones to interact with. Again, private companies can provide this service in exchange for a share of the parking fees. Consumers seeking the conveniences of smart phone-transit and smart phone-parking will force smart phone manufacturers and service providers into larger investments in order to protect or increase market share.

Potential incomes from providing smart phone-transit and smart phone-parking include:

- When each train, bus, or rideshare rider pays the driver, the smart phone-transit service is paid two cents per mile. One billion miles a year would provide \$70 million per year.
- The smart phone service provider pays \$1 of their monthly Internet service fee to start and maintain the smart phone-transit and smart phone-parking service. Five million smart phone owners generate \$60 million a year.
- SCAG might pay the smart phone-transit service a fee to obtain ridership data for adjusting routes and fares to minimize both vehicle-miles and passenger-miles-per-gallon.
- Businesses, schools, churches, and governments could pay for special (picture, music, or video) listing in the service so that people can identify them, find how to travel to them, and gather data on what draws customers, voters, students, and members.
- The smart phone-parking service provider may be paid from a portion of the parking fees (as is often done for traffic-light-running-ticketing cameras).
- Parking space owners can sell parking spaces at the time-of-use rate that fits the owner.

Individuals bear the cost of buying smart phones and services. Because individuals obtain smart phones for so many other reasons, the individual's incremental cost is small. Small is relative and flexible. Phones can be a provided at a nominal cost and profits made on the service. This low initial price is followed by higher operating fees is like obtaining a loan and using the phone purchase to pay for itself with the personal savings on transportation costs.

SCAG can trigger the smart phone market share race, advertise the program, and contribute to economic opportunity with contests and promotions. \$1 million would buy about 5,000 smartphones wholesale. The smartphones can be rewards for idea contests, student essay contests, or a recruiting contest. In a recruiting contest, contestants sign up regular customers at regular customer rates. The new customers' transit use is summed (aggregate manner to avoid privacy issues) for the contest period. The contestants whose

customers accumulated the most transit miles win the smartphones and year of service. The summed miles can be displayed on a website with hourly updates to create excitement. Note that a bus or taxi driver with a smartphone and the service creates a participating bus or taxi with automatic payment option and data transfer to the agency.

Charities can participate as receivers of rider's payments, by recycling smartphones, and by subsidizing service fees. Americans are more generous than fugal. That suggests past efforts to encourage more car-pooling were hindered because the \$2 fee for giving someone a 5 mile ride wasn't worth the time required to set-up a pool. However, generous Americans will hunt for passengers, if the fees are automatically transmitted to their favorite charity.

Business and government can save money and gain clients by providing employees who attend off-site meetings with the smartphones and service. Businesses doing so gain a marketing edge because their potential clients will want to be associated with such smart and energy efficient service providers.

### Future

Consider adding the parking meters as a smart phone feature gradually starting in 2013. The phones will need more accurate GPS, which can be provided using inertial navigation to improve satellite fixes, or by providing more GPS channels within the phone, or by providing more satellite repeaters. The accurate within-a-yard phone would link to the city's GIS (geographic information system) whenever the car stops in any mapped parking spot. Ergo, the smart phone becomes the parking meter.

### **Background information on zero-congestion, zero-collision vehicles**

Motor vehicles can use digital technology to avoid crashing into each other. Commercial aircraft already use this electronics to safely increase landings and take-offs in less time. It's called the Automatic Dependent Surveillance Broadcast System<sup>25</sup> and started coordinating 9,000 helicopter flights a day over the Gulf of Mexico in January 2010. The electronics is robust and keeps getting better. For example, the U.S. Air Force is developing tiny quantum-mechanical devices that improve your car keeping track of itself even if it loses its Global Positioning System signals.<sup>26</sup>

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<sup>25</sup> One of many possible descriptions: <http://www.rescuecom.com/blog/index.php/computer-support/flight-made-cool-and-safe-ads-b-is-coming/>

<sup>26</sup> <http://www.scientificamerican.com/article.cfm?id=getting-gps-out-of-a-jam>

Electronics is way cheaper than car insurance. In 2005, General Motors engineers estimated \$200 per car to upgrade OnStar to zero-crash, zero-congestion.<sup>27</sup> Of course, most other cars would have to be similarly outfitted for this low-cost approach.

Example actions

Allow, beginning January 1, 2013, single driver cars with zero-crash and zero-congestion technology to use car-pool lanes.

Announce such technology will be required for the “fast” lane of 3<sup>+</sup> lane freeways starting January 1, 2016.

Announce such technology will be required for all but the slow lane of every freeway in SCAG member jurisdictions starting January 1, 2020.

Announce a lottery which bicyclists and pedestrians enter by logging miles with their zero-crash technology equipped smart-phone, bicycle computer, or pedometer.

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<sup>27</sup> 2005 quote no longer available, low cost can be inferred from the Vehicle-to-Vehicle portion of <http://www.traffictoday.com/opinion.php?BlogID=45>



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February 14, 2012

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

Re: Comments on the Draft 2012 Regional Transportation Plan and Program  
Environmental Impact Report

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) draft 2012 Regional Transportation Plan (RTP) and associated Program Environmental Impact Report (PEIR). The 2012 RTP and PEIR are comprehensive documents that reflect the transportation and funding challenges the region will face in the coming years, in addition to the program level impacts and mitigation options. These documents are critical to the region's ability to operate, maintain, and improve the transportation system.

The Orange County Transportation Authority (OCTA) appreciates that SCAG has included the commitments identified in OCTA's 2010 Long-Range Transportation Plan, *Destination 2035*, as well as the demographic forecasts and land-use data submitted through the 2010 Orange County Sustainable Communities Strategy. In addition, OCTA appreciates the hard work and cooperation of SCAG staff throughout the RTP and PEIR development process.

OCTA has coordinated with Orange County's local jurisdictions to identify policy and technical issues related to the draft 2012 RTP and PEIR that are of concern to Orange County. The issues that were identified through this effort, and that are of particular concern to OCTA, are discussed below. Some of these issues were previously transmitted to SCAG in a letter dated October 7, 2011. Since a response to the October letter was never received from SCAG, OCTA strongly urges SCAG to carefully review the issues below and provide specific and detailed responses.

### **Innovative Financing and New Revenue Sources**

The draft RTP suggests that \$127.2 billion of the approximately \$219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a \$0.15 gas tax increase between 2017 and 2024. After that, the draft RTP assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.05 per mile,

beginning in 2025, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee.

OCTA cannot support an increase in fees, including the introduction of a mileage-based user fee, until a comprehensive economic impact study is completed and presented to the OCTA Board of Directors (Board) for discussion. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on the need for a return-to-source criteria that guarantees funds generated within Orange County are reinvested in Orange County. Finally, there should also be a process for recognizing and rewarding areas that keep the transportation system in a state of good repair.

### **California High-Speed Rail**

The draft RTP identifies Phase I of the California High-Speed Rail Authority (CHSRA) Project as a potential solution for improving interregional and intercity ground transportation. As described in the RTP, the project is planned to connect San Francisco with Los Angeles and Anaheim. This also assumes improvements to increase speeds along the Los Angeles-San Diego-San Louis Obispo (LOSSAN) corridor and the Metrolink Antelope Valley Line.

This project description is consistent with the draft CHSRA Business Plan, which OCTA has reviewed and provided comments on (Attachment A). OCTA would like SCAG to take these comments into consideration as the RTP is refined for adoption in April. In summary, these comments focused on the following:

- OCTA supports the phased delivery approach, which includes early investment in the existing LOSSAN and Metrolink infrastructure
- Rather than initially investing in the central segment, OCTA believes it is more prudent to begin implementation at the “bookends” of the system
- Extending the implementation of Phase I by 13 years may jeopardize existing funding due to timely use criteria
- The updated schedule should account for potential contingencies, and the associated potential cost increases should be addressed through contingency planning
- The project’s dependency on public funds could place CHSRA in direct competition for funding with existing transit service providers and local transportation agencies

- It is questionable whether the funding plan truly complies with the requirements set out in Proposition 1A, specifically Section 2704.08(c)(2), items A through K
- The operating assumption of “up to nine trains per hour” will likely result in an unnecessary level of service, and the projected operating surplus of \$1 billion per year is too optimistic
- The \$171 billion alternative investment in airports and roadways does not account for the airport and roadway investments that will be required both with and without the high-speed rail project

In addition, OCTA recommends that SCAG provide regular updates to the Transportation Committee and Regional Council regarding the CHSRA business plan, financial status, implementation progress, and any changes in assumptions by the CHSRA; particularly with respect to the status of the memorandum of understanding that better defines CHSRA’s commitments to near-term speed improvements for the LOSSAN and Metrolink services.

### **Regional High-Occupancy Toll Lane Network**

The draft RTP includes the implementation of a regional high-occupancy toll (HOT) lane network. This network appears to utilize existing and planned high-occupancy vehicle lanes to generate new revenues by selling excess capacity to single-occupancy drivers. The proposed regional HOT lane network assumes that Orange County would include HOT lanes on Interstate 5 (I-5) between the San Diego County border and the southern end of State Route 73 (SR-73); along I-405 between the northern end of SR-73 and the Los Angeles County border; and along State Route 91 (SR-91) extending the Express Lanes west to the Los Angeles County border.

On December 12, 2011, the OCTA Board approved the Express Lane Planning and Implementation Principles (Attachment B). OCTA requests that these principles be incorporated into the assumptions for segments of the regional HOT lane network that are within Orange County. Furthermore, the proposed HOT lane improvements to I-5, and SR-91 should be subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility, prior to inclusion in the constrained plan.

### **East-West Freight Corridor**

Due to continuing growth at the ports of Long Beach and Los Angeles, and increasing congestion on freeways throughout the SCAG region, the draft RTP

highlights the need for a zero emission East-West Freight Corridor. The corridor would aid the movement of goods between the ports and warehousing facilities located inland. This reflects the findings from the Comprehensive Regional Goods Movement Plan and Implementation Strategy.

Several other corridors were examined, including the SR-91, through Orange County and Interstate 10. After considerable study, the State Route 60 corridor was selected for further study based on its proximity to current and future markets, feasibility and right-of-way constraints, future truck volumes, and potential for reducing truck-involved accidents. The SR-91 was not selected primarily due to right-of-way constraints throughout the corridor, and lack of good access to warehousing locations.

OCTA supports the East-West Corridor as it appears in the Draft 2012 RTP. OCTA believes that the findings from the Comprehensive Regional Goods Movement Plan and Implementation Strategy are accurate, and OCTA encourages SCAG to build on the progress of the East-West Corridor based on these findings.

### **Other Regional Strategies**

SCAG proposes a number of other investments within the draft RTP that affect Orange County, and go beyond the Long-Range Transportation Plan (LRTP). OCTA recognizes that it is within SCAG's purview to plan for regional strategies that enhance transportation, such as the ones discussed below. It should be noted that OCTA is committed to delivering the projects within the LRTP. OCTA will only consider additional investments after revenues are identified to account for these commitments. The regional strategies identified by SCAG do not have clear funding mechanisms, and it must be made clear that their inclusion in the RTP does not constitute a commitment to fund and/or implement the improvements.

Examples of regional strategies include the congestion management projects identified by the California Department of Transportation. In Orange County, these corridors include State Route 57, State Route 22, Interstate 605, SR-91, and I-405. The improvements consist of relatively low-cost operational improvements such as ramp metering, auxiliary lanes, and other ramp and interchange enhancements. These are in addition to what was already submitted to SCAG by the county transportation commissions (CTCs) such as OCTA, and rely on funding sources beyond those identified in the LRTP.

The draft RTP also proposes additional transit enhancements throughout the region. The key transit investments that go beyond what the CTCs have committed include expanding local bus service, additional bus rapid transit, and new express bus service. These improvements are not specified in the draft RTP, but the additional cost to the region for these services is estimated at about \$2.6 billion. These additional costs are covered by SCAG's assumed transportation funding levels, which are beyond the available and committed resources identified in the LRTP.

An additional emphasis is also placed on walking and bicycling, which is referred to as "active transportation." The draft RTP proposes to increase the regional investment in active transportation by about \$4.5 billion. When the committed investments submitted by the CTCs are accounted for, the total active transportation investment is approximately \$6 billion for the SCAG region. Again, this additional investment is over and above resources identified in the LRTP, and the improvements are addressed only at the regional level.

### **Transportation Induced Growth**

Throughout the draft RTP and PEIR, there are references to transportation projects inducing growth and influencing land-use development and demand. One such instance is on page 80 of the draft RTP, which states the following:

"Transportation projects including new and expanded infrastructure are necessary to improve travel time and can enhance quality of life for those traveling throughout the region. However, these projects also have the potential to induce population growth in certain areas of the region. Although SCAG does not anticipate that the RTP would affect the total growth in population in the region, the RTP has the ability to affect the distribution of that growth."

These types of statements are misleading for a number of reasons. For example, the excerpt quoted above states that the "RTP has the ability to affect the distribution of growth." This can be understood to imply that SCAG has the ability to influence growth through the development of the RTP. OCTA trusts that this is not SCAG's intent. OCTA recommends that such references be clarified, as land use decisions are within the purview of local agencies.

Moreover, and more importantly, statements such as the above excerpt imply a lack of coordination between land-use and transportation agencies, especially

in the light of the recent efforts to develop the Sustainable Communities Strategies at the subregional and regional levels. There should be an emphasis in the RTP on the fact that land-use and transportation agencies are coordinating better now than ever before. OCTA recommends that SCAG clarify the negative implication of the statements regarding induced growth, and highlight the elevated level of coordination occurring today.

### **Draft Program Environmental Impact Report**

The Draft PEIR is a program level document that is intended to serve as an informational document, disclosing all potential environmental impacts and possible mitigation measures. OCTA has coordinated with a number of agencies throughout Orange County who have expressed interest in reviewing and commenting on the draft 2012 RTP and PEIR (Attachment C). These agencies have identified a variety of concerns during their review of the documents, in particular with the list of 549 mitigation measures within the PEIR. The key concerns that have been identified include:

- The Draft PEIR states that it “has made a preliminary determination that the proposed mitigation measures are feasible and effective.” It is unclear how this determination was made, and this assumption could prove to be inaccurate if and when these mitigation measures are considered at a project level. Therefore, any feasibility determinations in the PEIR must clearly state that they only apply at the program level.
- Several of the mitigation measures that identify SCAG as the acting agency propose measures that appear to exceed the purview of SCAG. SCAG must be mindful of local and county land-use and transportation authorities, and use great discretion when making commitments and/or suggesting policies and strategies that may impact and encroach upon local and county agencies’ responsibilities.
- The PEIR includes mitigation measures that restate existing requirements enforced by other agencies and, therefore, do not need to be repeated in this list of mitigation measures.

Additionally, OCTA understands that only those mitigation measures that state that “SCAG shall” are required to be carried forward. Any mitigation measure that identifies an agency other than SCAG can be considered at the discretion of the appropriate agency; however, such consideration is not required unless the agency chooses to use the PEIR in order to tier when performing project level environmental analysis.

Mr. Hasan Ikhata  
February 14, 2012  
Page 7

OCTA understands the term "can and should" to mean that the agency identified by SCAG in a mitigation measure has the authority to implement the mitigation measure, and that SCAG encourages the agency to do so. The term is not intended to imply that the measures are feasible nor required.

Finally, SCAG's current Intergovernmental Review ("IGR") policy "encourages" the use of the mitigation measures identified in the 2008 RTP PEIR to "aid with demonstrating consistency with regional plans and polices." SCAG will most likely update the IGR policy to refer to the 2012 RTP PEIR mitigation measures. As explained above, and as already recognized by SCAG, compliance with the RTP PEIR mitigation measures is mandatory for SCAG only. These mitigation measures, therefore, should not be considered in any way during the IGR process to determine consistency with regional plans and policies.

While OCTA shares many of the concerns raised by partner agencies and stakeholders in Orange County, such as those described above, the attached list of comments on the PEIR (Attachment C) focuses on the issues within OCTA's purview that were identified through the coordination efforts. Please provide responses and clarifications with regard to these comments.

OCTA appreciates SCAG's work on the RTP and PEIR to date and looks forward to the adoption of a complete and accurate 2012 RTP and PEIR in April. If you have further questions, please contact Gregory Nord, Senior Transportation Analyst, at (714) 560-5885.

Sincerely,



Paul G. Glaab  
Chairman

WK:gn  
Attachments

c: OCTA Board of Directors  
Executive Staff



## BOARD OF DIRECTORS

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## CHIEF EXECUTIVE OFFICE

Will Kempton  
Chief Executive Officer

December 22, 2011

Chairman Thomas J. Umberg  
Board of Directors  
California High-Speed Rail Authority  
770 L Street, Suite 800  
Sacramento, CA 95814

Dear Chairman Umberg:

On behalf of the Orange County Transportation Authority (OCTA), we appreciate the opportunity to review and comment on the California High-Speed Rail Draft 2012 Business Plan (Plan). As the only public agency to provide a financial contribution to the environmental clearance effort, OCTA has a vested interest in the California High-Speed Rail (CHSR) project, especially since the designated southern terminus for Phase 1 of the CHSR project is in Orange County.

The Plan is a marked improvement over the 2009 Plan and attempts to address many of the previous areas of concern raised by the Legislature, the Peer Review Group, the Legislative Analyst's Office (LAO), and affected communities. We are pleased that the Plan includes the blended approach as requested by OCTA and Los Angeles County Metropolitan Transportation Authority (Metro) in spring 2010. The plan recognizes the importance of existing passenger rail service providers and the need to link those systems with the CHSR project. We believe this is the key to the successful implementation of CHSR in Southern California, and the retention of federal support for this project. Linking into the existing successful rail services will provide the needed connectivity to regional transit systems to enable the full potential of the CHSR system.

While the Plan represents a more realistic assessment of the CHSR project, there remain areas of serious concern that should be addressed prior to submission to the Legislature and certainly prior to implementation. Below is a summary of our comments/ concerns:

- **Phased Delivery Approach:** We are pleased with the introduction of the phased delivery approach as it represents a more realistic delivery model and includes the blended operations approach as requested by OCTA and LA Metro; however, this approach begins with construction in the Central Valley instead of the Anaheim to San Fernando Valley and San Francisco to San Jose segments, often referred to as the bookends

of the system, which show much higher ridership and revenue, as well as providing connectivity to the most urbanized areas of the state. While there may be requirements which justify initial expenditures on the Central Valley, we believe it more prudent for the California High-Speed Rail Authority (CHSRA) to begin with project implementation at the bookends of the system. This approach will maximize the investment of the scarce state and federal funds and provide critical connections to the existing passenger rail systems in southern and northern California. If new track is constructed outside of the bookends in southern and northern California, it should be added between the San Fernando Valley and Bakersfield to connect the Pacific Surfliner and San Joaquin intercity rail corridors. This important infrastructure would fill the gap in passenger rail service which now exists between Los Angeles and Bakersfield.

- **Project Schedule:** We understand that the updated schedule aligns with the phased delivery approach, adding 13 years to the full Phase 1 project. Unfortunately, this change in schedule leads to significant cost increases due to inflation and escalation and it puts the existing funding sources in jeopardy due to timely use. Additionally, the updated schedule includes no contingency for project delay that may be caused by environmental clearance, legal challenges, gaps in funding, or limited availability of construction materials and qualified technical resources.
- **Cost Increase:** While we are aware that the previous cost estimate was in base year dollars and the updated cost estimate now includes normal escalation and inflation, the cost increase is significant. As stated in the business plan, the increased cost also does not address worst case scenarios for mitigations that may be required through the environmental process nor is it based on the high end of the range presented in 2010 dollars. These potential cost changes could be significant and should be addressed through contingency planning.
- **Funding/Financial Plan:** The funding plan is largely speculative and lacks any firm commitment of funding beyond the initial construction section. The current secured funding is not adequate to build either of the Initial Operating Sections, which the Plan states are the driving force behind attracting any private funding and future public funds. Additionally, the Plan relies heavily on scarce public funds on the front end of the project and could place the CHSRA in direct competition with existing rail service providers given the identified potential fund sources. This is of great concern to OCTA as it will directly impact existing and future planned programs. Specifically we are very concerned about the

assumptions on the use of federal Congestion Mitigation and Air Quality and Regional Surface Transportation Program funds that OCTA utilizes for highway and transit projects. In addition, the use of federal New Starts funds for the high-speed rail (HSR) program presents direct competition to OCTA and other local transportation agencies that rely on this program for the development of new fixed-guideway projects.

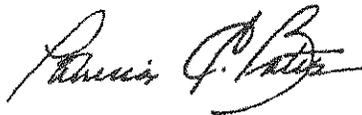
- **Compliance with Proposition 1A:** Proposition 1A Section 2704.08(c)(2) specifically states that any funding plan submitted to the Legislature "shall include ... all of the following," and items A through K are listed. Subdivision H requires that, "The corridor or usable segment thereof would be suitable and ready for high-speed train operation." "Corridor" is specifically defined in Section 2704.01 and refers to a "high-speed train system," which is defined in Subsection (e) of 2704.01 as a "system with high-speed trains and includes ... power system, rolling stock..." among other items. Additionally, Subsection K of 2704.08(c)(2) requires that, "The Authority has completed all necessary project-level environmental clearances necessary to proceed to construction." As noted by the LAO's November 29, 2011 report on the Plan, it would appear that there are serious questions that need to be fully analyzed as to whether the funding plan truly complies with the requirements set out in Proposition 1A.
- **Operational Assumptions:** The operating assumptions include some very aggressive service levels of up to nine trains per hour. This is likely to result in unnecessary frequency. The projected operating surplus of over \$1 billion per year is also speculative and based on an optimum number of trains; in our view, it is simply too optimistic.
- **Cost Comparisons:** The cost comparisons made in the Plan are based on a theoretical maximum of HSR capacity. More concerning is that the Plan does not include a build vs. no-build option for HSR and ignores existing capacity and other tools for managing congestion; in addition, the Plan compares a \$98 billion investment in HSR to a \$171 billion future investment in airports/roadways for equivalent capacity, but does not account for the roadway/airport work investment that will be required both with and without HSR.

The CHSR project represents the single largest public works project in California history, requiring extensive coordination and investment. OCTA is pleased to see the enhanced level of coordination between the CHSRA and existing service providers and railroad owners. However, we have grave

Chairman Thomas J. Umberg  
December 22, 2011  
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concern over what appears to be missing elements and unrealistic components of the Plan. We also urge the CHSRA to address the serious concerns regarding the Plan raised by the LAO prior to submission of this Plan to the Legislature. OCTA would further appreciate adequate responses to the issue raised in the letter. This project has the potential to provide significant improvements to California's transportation infrastructure, but must be done with prudent planning and judicious use of public funds.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Bates". The signature is fluid and cursive, with a large initial "P" and "B".

Patricia Bates  
Chairman

PB:jlb

c: Board of Directors  
Executive Staff

## Express Lane Planning and Implementation Principles

### User Experience

1. Express lane projects shall be designed and implemented to provide safe, reliable, and predictable travel times.
2. Express lanes shall be planned and implemented to support improved regional connectivity.
3. Design and management of the interface of express lane facilities with existing freeway, high-occupancy vehicle, and express facilities shall seek to achieve a consistent, seamless user experience.

### Existing System

4. Express lane projects shall not be implemented to replace committed projects to be funded with local transportation sales tax revenues.
5. Although Caltrans and Federal Highway Administration control highway operations, OCTA does not intend to replace existing mixed-flow freeway lanes with express lanes.
6. Existing high-occupancy vehicle lanes may be functionally encompassed within an express lane project, provided:
  - a. The total number of lanes is increased by the project; and
  - b. Both vehicle throughput and average vehicle occupancy levels can be maintained and/or improved.

### Operations

7. Express lane operations policies shall:
  - a. Assure coverage of capital and operations costs as well as maintenance responsibilities.
  - b. Maximize overall corridor throughput and efficiency through congestion pricing.
  - c. Promote increased average vehicle occupancy, including incentives for carpools, vanpools, and transit services.

### Revenues

8. Any express lane project revenues in excess of what is needed for annual debt payments, financing requirements, and operations responsibilities shall be used for congestion relief projects and expanded transit options in the same corridor area.
9. Continued operations of express lanes, beyond bond retirement dates, shall be subject to demonstrated congestion relief measured by vehicle throughput and average vehicle occupancy levels in the corridor.



Comments on the Draft 2012 Regional Transportation Plan –  
Program Environmental Impact Report

OCTA Comment #1

MM-AQ1 – This mitigation measure states that SCAG shall implement Transportation Control Measures (TCMs). However, page 26 of the Transportation Conformity supplemental report to the draft 2012 RTP states that “Although project implementation remains an enforceable commitment by project sponsor agencies, SCAG is responsible for assuring the timely implementation of TCMs.” OCTA recommends modifying this mitigation measure to describe SCAG’s role as being limited to monitoring the timely implementation of TCMs, consistent with the language from the Transportation Conformity supplemental report.

<p>MM-AQ1</p>	<p>TCMs shall be implemented as appropriate by SCAG and can and should be implemented by local agencies and project sponsors as appropriate. TCMs included in the Plan are identified in the Transportation Conformity Appendix to the 2012-2035 RTP/SCS (starting on page 26). CAA Section 108(f)(1)(A) lists the following sixteen measures as illustrative of TCMs:</p> <ul style="list-style-type: none"> <li>I. Programs for improved use of public transit;</li> <li>II. Restriction of certain roads or lanes to, or construction of such roads or lanes for use by, passenger buses or HOV;</li> <li>III. Employer-based transportation management plans, including incentives;</li> <li>IV. Trip-reduction ordinances;</li> <li>V. Traffic flow improvement programs that achieve emission reductions;</li> <li>VI. Fringe and transportation corridor parking facilities, serving multiple occupancy vehicle programs or transit service;</li> <li>VII. Programs to limit or restrict vehicle use in downtown areas or other areas of emission concentration, particularly during periods of peak use;</li> <li>VIII. Programs for the provision of all forms of high-occupancy, shared-ride services, such as the pooled use of vans;</li> <li>IX. Programs to limit portions of road surfaces or certain sections of the metropolitan area to the use of non-motorized vehicles or pedestrian use, both as to time and place;</li> <li>X. Programs for secure bicycle storage facilities and other facilities, including bicycle lanes, for the convenience and protection of bicyclists, in both public and private areas;</li> <li>XI. Programs to control extended idling of vehicles;</li> <li>XII. Programs to reduce motor vehicle emissions, consistent with Title II of the CAA, which are caused by extreme cold start conditions;</li> <li>XIII. Employer-sponsored programs to permit flexible work schedules;</li> <li>XIV. Programs and ordinances to facilitate non-automobile travel, provision and utilization of mass transit, and to generally reduce the need for single-occupant vehicle travel, as part of transportation planning and development efforts of a locality, including programs and ordinances applicable to new shopping centers, special events, and other centers of vehicle activity;</li> <li>XV. Programs for new construction and major reconstruction of paths, tracks or areas solely for the use by pedestrian or other non-motorized means of transportation, when economically feasible and in the public interest; and</li> <li>XVI. Programs to encourage the voluntary removal from use and the marketplace of pre-1980 model year light duty vehicles and pre-1980 model light duty trucks.</li> </ul> <p>The Plan has been prepared to facilitate implementation of TCMs and they also serve as air quality mitigation measures for the purposes of the PEIR.</p>
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**OCTA Comment #2**

MM-BIO/OS45 – OCTA recommends revising this mitigation measure to indicate that SCAG will accept CTC adopted conservation and mitigation strategies for determining priority conservation areas and in developing regional mitigation policies.

MM-BIO/OS45	SCAG shall develop a conservation strategy in coordination with local jurisdictions and agencies including CTCs to determine priority conservation areas and develop regional mitigation policies. SCAG shall produce and maintain a list/map of potential conservation opportunity areas based on most recent land use data. These conservation opportunity areas may be used by local jurisdictions and project sponsors as priority areas for mitigating impacts to open space resources. SCAG's forthcoming regional conservation planning policy will include additional information on conservation opportunity areas.
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**OCTA Comment #3**

MM-LU9 – SCAG has no land-use authority to implement this mitigation measure. OCTA recommends removing any reference to SCAG implementing the coordinated mitigation programs.

MM-LU9	SCAG shall develop and implement coordinated mitigation programs for regional projects, with an emphasis on regional transportation projects.
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**OCTA Comment #4**

MM-PS34 – This mitigation measure is unclear regarding the specific funding opportunities and programs that would be affected. Any new requirements implied through this mitigation measure that affect funding for transportation projects are not supported by OCTA.

MM-PS34	SCAG shall consider consistency with ongoing regional open space planning in funding opportunities and programs administered by SCAG.
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**OCTA Comment #5**

MM-PS118 – OCTA recommends revising the language in this mitigation measure to read as follows:

"SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches, models, and levels of performance for regionally significant projects to be consistent with regional plans."

MM-PS118	SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches and models and to specify levels of performance for regionally significant projects to be consistent with regional plans.
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**OCTA Comment #6**

MM-TR6 – OCTA recommends revising this mitigation measure to indicate that SCAG will defer to the CTCs to plan and coordinate at the project level.

MM-TR6	SCAG shall establish transportation infrastructure practices that promote and enhance security. SCAG shall work with transportation operators to plan and coordinate transportation projects, as appropriate, with DHS grant projects, to enhance the regional transit security strategy (RTSS). SCAG shall establish transportation infrastructure practices that identify and prioritize the design, retrofit, hardening, and stabilization of critical transportation infrastructure to prevent failure, to minimize loss of life and property, injuries, and avoid long term economic disruption. SCAG shall establish a Transportation Security Working Group (TSWG) with goals of 2012-2035 RTP/SCS consistency with RTSS, and to find ways SCAG programs can enhance RTSS.
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**OCTA Comment #7**

MM-TR15 – OCTA recommends revising the language to indicate that SCAG will coordinate closely with CTCs and local agencies when developing advocacy strategies regarding congestion pricing.

MM-TR15	Congestion Pricing: SCAG shall advocate for a regional, market-based system to price or charge for auto trips during peak hours.
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**OCTA Comment #8**

MM-TR21 – SCAG has no authority to "ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation." Please modify the language to remove the "SCAG shall", and to state that "Local agencies can and should ensure" this effort "to the extent feasible".

MM-TR21	Transportation Planning: SCAG shall and local jurisdictions can and should ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.
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**SUNLINE TRANSIT AGENCY - COMMUTER BUS SERVICE  
RTP ID 3TL907 – COMPLETION YEAR 2012**

Weekday  
Service

Westbound

	Thousand Palms	Morongo Casino	Banning Ramsey & Sunset	Beaumont-City Hall	Nason & Fir	Moreno Valley Mall	Downtown Riverside MetroLink Station	Downtown Riverside Transit Terminal
Palm Desert	5:00	5:33	5:54	6:05	6:25	6:36	7:06	7:19
4:45 am	5:00	5:33	5:54	6:05	6:25	6:36	7:06	7:19
5:45 am	6:00	6:33	6:54	7:05	7:25	7:36	8:06	8:19

Eastbound

Downtown Riverside Transit Terminal	Downtown Riverside MetroLink Station	UCR Lot 30	Moreno Valley Mall	Nason & Fir	Beaumont- City Hall	Banning Ramsey & Sunset	Morongo Casino	Thousand Palms	Palm Desert
5:19 pm	5:27	5:41	5:56	6:11	6:35	6:47	7:05	7:35	7:57
6:35 pm	6:45	6:59	7:14	7:27	7:51	8:03	8:21	8:51	9:13

February 13, 2012

The Honorable Pam O'Connor  
President  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

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Southern California

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Los Angeles Area  
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Los Angeles County  
Metropolitan  
Transportation Authority

Orange County  
Business Council

Orange County  
Transportation Authority

Riverside County  
Transportation Commission

San Bernardino Associated  
Governments

Southern California  
Association of Governments

Ventura County  
Transportation Commission

**Subject: SCAG 2012 Regional Transportation Plan**

Dear President O'Connor:

Mobility 21, Southern California's transportation advocacy coalition, respectfully submits these comments as part of the ongoing efforts of Southern California Association of Governments (SCAG) to produce a comprehensive 2012 Regional Transportation Plan (RTP). Mobility 21, being comprised of both business and government entities is uniquely positioned to provide insight into the RTP process. We recognize SCAG staff's diligence in crafting an RTP that will meet the requirements of the federal process and of the newly-required SB375 legislation. Mobility 21 also appreciates the open process and intensive outreach SCAG has undertaken during the development of the 2012 RTP. Nevertheless, we share these ideas regarding the RTP as currently laid out and thoughts on reforming the RTP process for future success.

First and foremost, our goal is to assist SCAG with ensuring the final adopted RTP is both comprehensive and defensible, provides flexibility to the county transportation agencies responsible for delivering projects under the program, and supports a strong private sector economic engine. We have five recommendations to provide to SCAG at this time:

**Protect Locally-Approved Sales Tax Measures**

The program of projects submitted to SCAG by the county transportation commissions consist in part of projects promised to voters as part of locally-approved sales tax measures. Mobility 21 reminds SCAG that these projects individually and together constitute a contract with the taxpayers that must be respected and implemented as voters approved. Local taxpayers have prioritized the distribution of funds in their respective sales tax measures to a complete, multi-modal program of projects to meet local needs. Changes cannot and should not be made without taxpayer approval. The RTP should strengthen and enhance the ability of the counties to deliver these projects, while at the same time supporting their efforts to deliver non-sales tax projects that will provide greater mobility, congestion relief, and air quality benefits. The RTP needs to bolster the efforts of local transportation agencies, and the business community that supports them, to protect this essential covenant with voters and taxpayers. Failure to do so will make approval of future funding measures nearly impossible.

### **Thorough Economic Analysis**

As yet, the impact of the elimination of redevelopment agencies is unknown in terms of the delivery of transportation projects. Some business groups have also expressed concern over the feasibility of several of the proposed financial options and mitigations included in the RTP. Mobility 21 strongly urges SCAG to incorporate a thorough economic analysis into the development and approval of the RTP so that all elements of the final approved plan support the economic growth of this region.

### **Locally Sensitive Context**

This RTP is the first of its kind. SCAG has done a yeoman's job of working to produce Sustainable Community Strategies, housing analysis and transportation projections in the RTP. However, Mobility 21 remains concerned that intensifying development in the urban core may impact future housing availability, choices and affordability. Recommendations regarding land-use should take into account the region's disparate communities, geographies, market forces, and take a flexible approach to protect the diversity of the region.

### **Protect Region's Economic Competitiveness**

A large share of our regional economy is dependent upon the flow of goods from our ports, through the counties and to the rest of our nation. Infrastructure improvements related to goods movement are vital for Southern California to remain economically competitive. As other options become available both nationally and globally for cargo movement, Mobility 21 is concerned that components of the RTP could put the region at a disadvantage, such as implementing new technologies before they are feasible or imposing fees on businesses operating in the SCAG region. New revenue sources should be developed and implemented at the federal level, not the local and regional level.

### **Reform the Process**

Mobility 21 recognizes that federal and state transportation planning processes are imperfect and that SCAG must work within the proscriptive requirements of existing laws and regulations. We therefore propose to identify systemic weaknesses in the process and work to reform the flaws in the RTP process that consume substantial resources, but add little or no value. Our intent is to help reduce the time and cost expended on the process and to remove regulatory hurdles that inhibit the development and delivery of effective, efficient, and timely transportation projects and services. Specifically, Mobility 21 encourages changes in state legislation that would enable MPO's to use low and no-cost alternatives to reach out to the public in lieu of resource-heavy public meetings. Additionally, since 83% of the funding for projects in the RTP comes from non-federal sources, Mobility 21 believes that empowering the federal government to veto a locally-approved financially constrained RTP unnecessarily jeopardizes federal funding needed to complete projects. Mobility 21 therefore will seek modifications to federal legislation that would enable MPO's with over 75% local funding to self-certify that an RTP is financially constrained.

Again, Mobility 21 applauds SCAG for the open and transparent process used to develop the 2012 RTP. We look forward to working with SCAG staff in the final stages of RTP implementation to ensure the strongest possible document is delivered to the Regional Council in April. If you have any questions or would like to follow up on any of our comments, please contact me at [mprimmer@mobility21.com](mailto:mprimmer@mobility21.com) or 949-288-6884.

Sincerely,



Marnie O'Brien Primmer  
Mobility 21 Executive Director

CC: SCAG Regional Council  
Mobility 21 Board of Directors

## **RTP Document Text**

- p.31/41 Environmental Justice Appendix
- p.42/52 The full list of RTP projects is provided in the Project List technical appendix.
- p.58/68 Aviation technical appendix
- p.70/80 Goods Movement Technical Appendix
- p.127/137 Subregional Framework and Guidelines (see Appendix 20
- p.140/150 Appendix: Transportation Conformity.
- p.153/163 Additional information regarding air quality and energy is included in Chapter 1 and Appendix: The Role of Vehicle Technology in Meeting Long-Term Air Quality and Energy Challenges.
- p.153/163 (See Appendix: The Role of Vehicle Technology in Meeting Long-Term Air Quality and Energy Challenges, for more information)
- p.154/164 Reference: 2012 RTP/SCS Chapter 4: Sustainable Communities Strategy, p. 117; 2012 RTP/SCS Appendix: SCS Background Documentation; 2012 RTP/SCS Appendix: Growth Forecast
- p.156/166 2012 RTP/SCS Appendix: Transportation Conformity Analysis; 2012 RTP/SCS Appendix: Performance Measures
- p.157/167 2012 RTP/SCS Appendix: Growth Forecast
- p.167/177 Additional speed maps are provided in the Highways and Arterials technical appendix.
- p.176/186 Appendix 19
- p.192/202 (see Transportation Conformity appendix for details).

## **2012-2035 Draft RTP/SCS Downloads**

- Draft 2012-2035 RTP/SCS (Complete Report)
- Executive Summary
- Chapter 1: Vision
- Chapter 2: Transportation Investments
- Chapter 3: Financial Plan
- Chapter 4: Sustainable Communities Strategy
- Chapter 5: Measuring Up
- Chapter 6: Public Participation
- Chapter 7: Strategic Plan

## **Supplemental Reports**

- Active Transportation
- Aviation and Airport Ground Access
- Congestion Management
- Economic and Job Creation Analysis of 2012 RTP/SCS
- Environmental Justice
- Goods Movement
- Growth Forecast
- Highways and Arterials
- Intelligent Transportation Systems
- Passenger Rail
- Performance Measures
  - NHTS Model Documentation Report
- Project List
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# Comments on the SCAG 2012 PEIR

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Subject; draft RTP/CSC Comments

February 14, 2012

These comments are on the draft 2012-2035 RTP/SCS and will use the basic sequence of the SCAG interactive comment issues, but after an introductory statement regarding the Flow Boulevard concept is made.

### **Overall Comment**

Rather than overly focused, commuter driven centralizing of trips via expensive rail more planning and building should be made to provide for increased population density and job creation to reduce travel and commuting with shorter trips; think “Centers Concept” in sub-regional aggregations. In that manner extensive low cost medium capacity transportation and land use in patterns and corridors will provide a much more Southern California like growth and compatibility with what exists.

The specific overall comment to be made is that SCAG needs to include the Flow Boulevard concept in its planning vision formation, criteria and plan recommendations for the Regional Transportation Plan. It may be better said that SCAG being the lead agency should see that County agencies like the Los Angeles County Metropolitan Transportation Authority be directed to enlarge its forms of transportation improvement to include well crafted land use and transportation improvement forms such as the Flow Boulevard technique.

A Flow Boulevard is a combined transportation and land use improvement technique which has a semi-limited access configuration and includes what are known as Intelligent Transportation System (ITS) technologies. In that it combines strategies for land use development a Flow Boulevard (FB) can also be included in the Smart Growth category. The combined planning elements then can become a smart growth transportation corridor or if used in already dense urban areas, a way to “fix what is broken” regarding congestion or desperate land use conditions.

The transportation capacity and the land use density range can be said to be “medium” on both counts. The first stage FB transportation capacity is in the 150,000 person trip range per day and the land use would generally be a mix of R-2, and R-3 residential, as well as C-1 and C-2 commercial densities in the corridor.

The Flow Boulevard corridors evolve from selected existing urban street right of ways (ROW) without widening. The use of ITS strategies brings about the increased capacity over existing street usage. The corridors can be thought of as in-fill structures that follow the SB 375 mandate to improve and combine land use densities and transit while reducing vehicular miles traveled (VMT) in the consolidating communities and cities in Southern California. The corridors are so selected to as well “protect” existing residential communities from excessive traffic. There is a website dedicated to the development of the transportation and land use concepts at [www.FlowBoulevardPlan.com](http://www.FlowBoulevardPlan.com). In the comments below specific examples will be referred to using URL links as best as can be arranged or named call outs.

## **A Brief Definition of Flow Boulevards**

A Flow Boulevard (FB) is based upon the utilization of a pair of one-way streets separated by a city block or several and includes synchronized traffic signals to allow vehicles to flow with the objective of not stopping to create higher capacities and higher average travel speeds along the corridor in both directions. Flow Boulevards are not to be utilized in “downtown like grid patterns” but are to be used in “corridor” configurations which typically will have lower density adjacent development. The highly accessible blocks between the one-way paired streets, as well as land use directly adjacent out side of the paired streets are intended to be developed with higher density land uses than that are typically found in Southern California “sprawl development”. The Flow Boulevard form can be a “growth corridor” accepting higher density while providing increased transportation capacity.

Local streets perpendicular to the FB are not allowed to cross each of the one-way streets but local traffic is made to turn into the one-way flow or if FB traffic is exiting into the adjacent local street, it is made with a right turn. The streets between the one-way pair and connecting them are typically made to be one-way streets so that reversal of direction can be made or to go around the block and continue in the original direction. For more explicit operation diagrams and further discussion on the website at [www.flowboulevardplan.com](http://www.flowboulevardplan.com) click on the menu title “How the Boulevard Works”.

Regarding the first stage FB where pedestrian and vehicular cross traffic occurs at the same grade as the FB; the variables of signal spacing, vehicular arterial street crossing demand, speed of travel (typically 40 mph) and the length of signal cycle time is dealt with to optimize green time for the FB “pack” of flowing vehicles. A reasonable objective is to obtain 1200 vehicles/lane/hour that will give accommodating cross traffic and pedestrian crossing time intervals at approximate 2000 foot intervals (1/3 mile). Each FB direction is timed separately to guarantee capacity and flow. In a 4 lane FB, in each direction, where the fourth lane is a Rapid Bus Transit lane combined with HOV use, the daily capacity for the corridor can be approximately 150,000 person trips per day.

Briefly, the 2<sup>nd</sup> stage of the FB is involved with developing grade separated circulation for pedestrians to bring increased green time for lengthening “the pack” that flows therefore the hourly per lane and daily capacity of the FB. Similar coordination of grade separation for cross vehicular traffic will be necessary for the maintaining of the FB green signal time

intervals. The third stage of the FB is when there is complete elevated pedestrian circulation and open space provided by adjacent land use development and there is complete grade separation for major arterial vehicular cross traffic in that segment of the FB. It should be noted that there would be different stage FB development along the corridor going from the no FB condition all the way through 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> stage segments.

The time increment of evolution is basically “from here on out”. For Los Angeles in fifty years there is potential for a forty percent increase in population or more and certainly much more than that in corridor developments. Flow Boulevard corridors are three dimensionally organized dense environments that can happen and probably must happen to allow Los Angeles to solve its traffic problems and preserve its character and lifestyle. Selected areas of land use density allows construction of grade separated vehicular crossings to be made as well as elevated pedestrian and bikeway circulation to cross the FB providing continuity of urban fabric across the FB corridor. It is anticipated that a relative few number of these corridors are needed to solve the problems that have developed in Los Angeles. Since they grow out of the existing street network they respond to need and can evolve in density and capacity to it.

The capacity of the 3<sup>rd</sup> stage FB with continuous flow traffic is in the 2400 vehicle lane/hour range giving 280,000 person trips/ day for the total eight lanes with conventional spacing between vehicles and would not be expected to evolve to that capacity for maybe 60 years or more. Computerized controlled spacing of one or two lanes in each direction opens a whole expanded realm of additional capacity is even further off. That the FB becomes a guideway in segments accepting evolved technologies as time goes on is important and a relevant transportation and land use element able to work “from here on out”.

### **Example Applications of Flow Boulevards**

Adding capacity to corridors “to fix what is broken”: In this actual proposed application, a FB is to be added as a frontage road to the 405 corridor on the Los Angeles Westside to eliminate congestion to make that segment of the 405 work without failing, along with its interchange with the I-10 which can make it work without failing and the net result of making these corridors have adequate capacity for the commuter to West LA is to be able to take enough traffic out of the West LA arterial grid so as to eliminate the current traffic gridlock. See Exhibit A at the end of this comment text for more description.

Add transportation capacity and land use development to mend two communities and their common edges: In this instance there are two differing communities where there has been traditionally a major travel corridor between them that now has broken down due to a travel demand overload into congested traffic. This puts additional travel in the form as “cut through traffic” into the community to the north (Hollywood) which has become gridlocked exceeding the ATSC usage limits. Both communities (north and south) of the major travel corridor are becoming blighted due to traffic invasion and a mix of dissimilar land uses that resist compatible interactions. The FB application would provide the needed increased capacity to restore the traditional major travel corridor of through traffic so that “over flow” traffic does not invade either adjacent community. It would then be an urban design task to

employ land use development as a part of the FB development to provide appropriate north-south circulation and land uses to mend, bring attractions and compatibility between the two communities. A preliminary corridor is laid out on the FB website and can be reached by link [www.flowblvd.com/basinplan2.html](http://www.flowblvd.com/basinplan2.html) or by clicking on the menu title “LA Basin FB Loop and Transportation Corridor Study”, then when that comes up click on the Page 2 link (in blue) to get to the “Santa Monica Flow Boulevard Corridor” which is a preliminary study. Scroll down to the Hollywood segment.

Protect adjacent land use and entire communities from unnecessary traffic: The configuration of a LA Basin Loop is intended to reduce traffic invasion of the extensive single and multi family residential communities of the Basin as well as to provide a way to circulate within the Basin and to accept part of the multi-modal commuter travel to Basin employment centers. The configuration would provide the additional transportation modes as back-up to the subway and rail network being built in the Basin. The extensive central form of residential communities surrounded by work centers and geographic features is unique in world city form organizations. It would be a great loss to have traffic gridlock claim yet more square miles of Los Angeles. There is further discussion on this subject regarding the alternative locations of the Westside Subway Extension at two different websites 1/ [www.flowblvd.com/subwayextension.html](http://www.flowblvd.com/subwayextension.html) or by clicking the website menu on Subway Extension and 2/ at [www.flowblvd.com/basinstudy.html](http://www.flowblvd.com/basinstudy.html) or by clicking the website menu on Basin Loop/Corridor Study (it’s page one).

In this discussion is revealed that there is the traffic problem of attracting too many trips to an inadequate transportation infrastructure but there is the additional problem that the existing boulevard structure has “built-in” bottleneck configurations which cannot be dealt with unless the entire central residential community form is involved with congestion and “cut-through” traffic.

Use as the necessary multi-modal back-up component to a Subway Corridor: As part of the Westside Subway Extension study in the LA Basin area it became evident that the subway and the development around stations would attract a percentage of vehicular trips in the corridor. It might be a fairly high percentage of trips depending on the amount of regional trip attractions that would be built. There is a fair amount of discussion on the matter located at the link [www.flowblvd.com/subwayextension.html](http://www.flowblvd.com/subwayextension.html).

Sub Regional Consolidation Being Structured with Growth Corridors: Being that Flow Boulevards increase transportation capacity and provide advantageous land use relationships as density is developed, it is logical to structure additional growth in the low density existing settings of Southern California by the FB technique. The examples referred to in the before mentioned website are in the Los Angeles County sub region and within geographical subdivisions of it, essentially the San Fernando Valley, East LA areas, South Bay, and the LA Basin area. Whereas the LA Basin area needs transportation improvement to stabilize the relationships between transportation infrastructure and land use, it does not need growth in the Westside area particularly but it does need renewal growth in the eastern area towards downtown Los Angeles.

Outside of the Basin the low density areas of residential, commercial and industrial land use are a particular opportunity, if not necessity, for corridor growth development. Given the low density existing sprawl where the majority of trip mileage is generated and performed, growth corridors are necessary given by the recognition of energy security to reduce VMT, as well as the need to increase economic development productivity for both existing and the future increased population to sustain an acceptable standard of living. "Growth is necessary" to adapt the urban form. It is imperative that growth be directed to make the necessary improvement to functional and spatial relationships to bring about the efficiencies that will allow affordable, sustainable and desirable city environment.

While accepting greater population, VMT must be reduced by the proximity of needed land uses. The area where the greatest amount of VMT can be reduced while conforming to affordable, sustainable and desirable objectives is in the existing low density suburban areas. The average trip length in LA County is almost 16 miles long. The length must be reduced and a general transformation to non fossil fuel energy in small truck and automobiles needs to take place while increasing transit options as well. In transit the greatest cost benefit comes from bus usage. The cost of five miles of light rail construction (ROW, hardware and typical occasional grade separations) can pay for 100 miles of Flow Boulevard which is fully outfitted including hybrid articulated buses at generally 10 minute intervals ( local bus costs reducing time intervals further have not been included). In addition to the greater amount of transit coverage there are approximately 16 times the amount of patron transit miles developed (volume of users). On a typical FB paired street, whether two or three lanes of auto and truck flowing lanes are used, there would always be the BRT/HOV lane provided in each direction of the Flow Boulevard.

A preliminary allocation study at [www.flowboulevardplan.com/lafbnetwork.html](http://www.flowboulevardplan.com/lafbnetwork.html) has been made. It should be pointed out that since that study was made it is recognized that it is very likely that the flow boulevards seen in that plan would be discontinuous not really long connected corridors. That is because a problem solving FB would be in response to a specific location, town or city. Maybe in the future continuous connection may be built up however.

### **Use of the Interactive Comment Sequence**

Generally I will be commenting on these issues from the viewpoint that I understand from being familiar with the Los Angeles County and its MTA. I would think that the same kind of comments would apply elsewhere. I am trying to be more specific with examples and applications to actual places and peoples. I find little wrong with SCAG criteria but it strikes me as being abstract. I realize SCAG can't design for all six counties. But more specific examples of how multiple criteria and objectives are put together in plans, urban forms, transportation corridors and programs would be an improvement. So in my comments I will refer to both the policies, objectives and strategies that SCAG is developing but I will also respond with reference to the Flow Boulevard concept as it reflects and incorporates the criteria and objectives that SCAG seeks to make a part of plans for the RTP/SCS.

## **01 OUR VISION**

### **Towards a Sustainable Future**

Mobility, Economy, Sustainability; Realize the Vision

In LA County the MTA (Metro) has a major emphasis on expansion of the rail network. My general impression is that there is too much emphasis on rail to the fault of being unbalanced in multi modal considerations as it relates to comprehensive planning and sound economics. This emphasis brings about the speculative dimension of proceeding with a narrow view of what and how things should be. This brings in the dimension of risk and the realm of making very large misallocations of resources.

It's not that their proposed system is too big, it is that it is too expensive to be realized in a short amount of time and that over time there may be much needed revisions and additions such as Flow Boulevard networks to the plan. Metro rarely refers to serving population and land use patterns. And the talk of accelerated financing by borrowing from the future and of laying an even greater burden on the public is frightful. It is as though another "bubble" is in the talking stages of being made; a transportation bubble and how disastrous a thought!

On the Westside of LA, having a notorious level of congestion, the inclination is not so much to solve the communities' problem but to simply find a way to build rail transit and if there are major deficiencies with continued problems then there is no budget to actually solve the traffic problems. That appears to be the direction of their approach overall.

The SCAG objectives of Mobility, Economy and Sustainability falls through the cracks in the kind of planning the MTA and the City of LA is performing. This problem is showing up in countywide instances as well as in City Community Plans. Mobility is not being achieved in City Community Plans, and congestion persists countywide. Much of the MTA response to the event of recession is essentially that of trying to re-inflate past trends that were heavily dependent on speculative real estate ventures. That is not an approach to obtain sustainability with. Growth based on assemblage of businesses that provide jobs and sustained productivity will produce better results.

There is some room for "recovery" by supporting real business with access and the solving of problems of congestion. The larger question however is how we obtain new growth in our economy to provide future employment for the young and replace jobs that have fallen away with past trends. This area of planning should be of great importance in securing the economic future that is needed in Southern California and I think extensive Flow Boulevard "growth corridor development" can provide the necessary structure and place to make it happen. This kind of growth related to transportation improvement seems to be absolutely missing in Metro's planning elements.

## **The Setting**

### Economic Recession, Population Growth

Fixing real transportation problems while developing a new and expanding economy is needed. As stated in the above section dealing with Sub Regional Consolidation, the suburbs are where the majority of the additional 2 million people in LA County will be located over the next twenty five years. Extensive low cost transportation improvement and low cost land use development that is able to bring opportunities for starting new businesses are the kinds of policies and programs that should be identified and made apart of the denser consolidation that is to occur within existing communities and work centers. Flow Boulevards as growth corridors would be instrumental in bringing that about.

In addition to using a transportation form that targets reduction of VMT it is necessary to bringing about programs and policies that promote the attraction of businesses that will help form a new relevant economy. A concerted effort to attract new businesses and manufacturers from other counties, states and countries by providing the attraction of affordable start-up, connectivity, idea environ, affordable housing, technical support, access to needed materials and generally friendly government should be a part of growth corridors. These programs should be coordinated city wide if not countywide.

In LA County the radial patterned commuter rail plan that is focused on the LA Basin and is so expensive to develop will carry only an approximate 2 and 1/2% of the travel miles made in LA County on the rail system. That leaves a remainder of 16% in vehicular commuter modes to the LA Basin. I'm speaking about the percentage of total travel miles in LA County. That leaves more than 90% of travel (including the 16%) in vehicular modes mainly circulating in suburban locations. This 90% of travel is the area to target for reduction of VMT by making those areas more self sufficient in land uses that allow shorter trips. This responds to the fact that LA needs growth to adapt to an urban form that supports energy security by reducing energy usage. This also secures economic stability and growth through low cost transportation development in areas that can and desire to receive development in low land cost areas.

### Safety, Multi-Modal System

The Flow Boulevard system separates vehicles from pedestrian and bikeway circulation over time. This allows safe and aesthetic crossing of the FB corridors as well as the direct connection to the high density land use areas and open space centered in the FB corridors. While each corridor would have different characters given their density and location, example images of such integrated environments in model form can be seen on the FB website. By clicking the menu on "Elements and Travel Demand" photo images of a model environment are presented. There are two portions of images showing development of such environments separated by a potion of the study dealing with travel dement. Just keep scrolling from one end to the other. The link is [www.flowblvd.com/elements.html](http://www.flowblvd.com/elements.html).

## Transportation System Management

Flow Boulevard characteristics of TSM and ITS are pretty well expressed in the FB descriptions above. What has not been stated is how the “medium capacity” FB system can relieve the freeway network of much of the local and medium length travel that crowds our present freeways. This would allow freeways to specialize more into long trip facilities and thereby extend their life and performance as a system that will not see many more miles added to it in the LA County area.

## **Challenges and Opportunities**

### Transportation Finance, System Preservation, Goods Movement

The Flow Boulevard system looks to increase the tax and service fee base to produce more revenues. The FB system is a “money maker” not a facility that needs subsidies such as rail transit. Built up corridors throw off revenues way in excess of their cost and maintenance. In about 20 years a typical mile of FB would likely throw off \$150,000 million in discretionary monies that can be used elsewhere. With 100 miles of FB that is \$15 billion annually to put elsewhere. For more discussion on this subject click on the link of [www.flowblvd.com/basinstudy.html](http://www.flowblvd.com/basinstudy.html), that's page one. Scroll down until a City of LA Chart in green named “Where the Money Comes From” appears. After the charts begin reading the discussion titled “Flow Boulevards Pay Their Own Way”.

System preservation occurs by using the existing street system and settlement pattern to the advantage of integral growth, land use up dating and transportation improvement. And of course people and goods movement is provided with the FB system. Remember as well the points made above where the FB can help protect (preserve) communities and the aspect of extending the life of the freeway system. That is being done by the FB system taking on the burden of local and medium length trips. And finally this shows how the FB transportation system helps preserve the entire system by the use of the excess revenue being “thrown off” by the money maker Flow Boulevards.

### Integrated Land Use and Transportation

The Flow Boulevard concept could be the “poster image” of representing the mandate of SB 375 integration of land use and transportation. Over time, with programs that help transform vehicular movement to electric (or non fossil-fuel) power integrally, comfortably and economically; then that is the objective is it not?

### Air Quality, Energy, Adaptation

From what I know, natural gas will afford a step in the right direction for air quality over coal and oil; coal in producing electricity and oil in propelling vehicles. Unconventional natural gas resources seem to be cheap and abundant, with low NOX emissions and can be counted upon 24/7. With shorter trips, less energy used in vehicles, greater public transit use in extensive BRT networks, use of walking environments with “proximity” and a transformation to electricity instead of gasoline all seem to add up well in the kind of land use and transportation patterns provided by Flow Boulevards.

Adaptation must be made affordable by an economy that has the resources available to be applied to the cost of that adaptation. I can't see where large expensive rail networks that are supposedly justified by the need to commute large distances should be embraced with so much enthusiasm. There should be ways to communicate and produce more without so much commuting. More money will be needed for adaptation, which the growth corridors provided by the Flow Boulevard concept make available and in turn “throw off” revenues. Better conserving architecture fits in this model as well.

## **Plan Overview**

Detroit Michigan lost half its population between 1980 and 2002 because the car companies could not compete with other manufacturers in the world market. Will Southern California lose half its population due to excessive population dispersal, over use of natural resources, of not developing a more efficient urban form, of making expensive transportation systems, not transferring to less expensive and cleaner energy and having an over reliance on commuting?

## **TRANSPORTATION INVESTMENTS**

I have used the first chapter of “Vision”, to focus comments on the respective issues in a kind of combined conceptual way. By this I mean that considerations of Investments, Funding and Future Land Patterns are combined with the Vision issue response. As an architect I tend to think using an integrated concept rather than what seems to me as overly abstracted when broken down so much. I will however generally respond to issues posed in these subsequent chapters with general overview comments referring to some of the issues.

Getting the Most Out of Our System: The major point is to maintain the basic existing street and land use system while evolving segments so as to improve the relationships and achieve new levels of population growth (in some areas) and transportation capacity within corridors. By the use of the right mix of land uses, more sustainable neighborhoods and communities are obtained by way of those proximities, shorter vehicular trips and to divert trips from SOV by the inclusion of transit. In this setting the SOV use can in effect “shrink”.

As pointed out in the “Vision” comments, congestion should not be allowed to develop as it has in the LA Basin. Those bottlenecks and inefficiencies are not a strategy to make a better

city with. It is a failure and in due course will be corrected; possibly with some help by SCAG as well as others.

By using the existing street system to greater advantage there is less need for expensive long distance rail trip development. In the Measure R list of projects there are basically no TSM and ITS projects to take care of the mounting congestion in the LA Basin. And the City of Los Angeles DOT does not seem to be able to cope with the condition either. I am very concerned that with the impacts being made on the function and standard of living in Los Angeles communities. Appropriate policies and transportation improvement must be employed to eliminate congestion.

Transit Policies: By expanding the BRT network it is appropriate to lessen time and trip length that is commensurate with making communities self sufficient and reduces VMT. This is the most effective way to increase transit use in LA County and the most direct way of going after and reducing the length of the 90% of SOV trips. Point to point BRT trips would basically be at 40mph speeds for really reducing bus travel times.

Active Transportation: Pedestrian circulation, bikeways and open space are an integral part of Flow Boulevard development. By developing its circulation separately from the street its development becomes the condition to which greater capacity is obtained from the roadway itself. This is a unique relationship where building pedestrian elevated circulation and open space creates increased vehicular capacity in Flow Boulevards.

The term “complete streets” tends to imply that most all arterial streets should accommodate all modes of travel. This of course would make major conflicts on many streets. The better view is to accommodate all modes of travel within a community plan that respects the character, purpose and safety of each mode and give it the necessary spaces, routes and function that allows that mode to perform its given task. On the FB website at [www.flowblvd.com/elements.html](http://www.flowblvd.com/elements.html) one can see highly developed environs with separate modal circulation systems interrelated.

### **03 FINANCIAL PLAN** Generalized Comments

Trimming project expenses and making more affordable budgets: There is still a great deal of underutilized capacity in most roadways. There should be more thought in utilizing the unused capacity because it is so less expensive to provide for the mobility of existing and future growth. It is also a way to up-date the mix of housing stock and community services, retail and work locations to respond to changes in demographics and the economy.

There is generally great risk in over designing a transportation plan that cannot be achieved without taking funds from other social costs that are more important. It would appear to me that the Metro ambitious and self serving rail plans have that budget busting, excessive social burden look to them. They seem narrowly conceived by not having comprehensive planning attached to them. And now there has been a realization that we have been living through an era of very fortunate economic circumstances for the last 40 years and that those

conditions have changed. Proceeding with caution, flexible plans and not getting over extended would be prudent if not absolutely necessary. And please refer to the above linked discussion regarding “Flow Boulevards Pay Their Own Way” in the” Challenges and Opportunities section for an alternative approach to providing growth and transportation improvement.

Primarily use “Pay-Go” (pay as you go): By using land use development in combination with transportation improvement in growth corridors, transportation improvement costs can be tied directly to the cost of the increased land use density developments. In this manner much of the transportation improvement pays for itself and then continues to do so out of property taxes and fees generating revenues for the governing jurisdiction. The generation of continuing excess revenues is a source for paying for additional infrastructure improvements and maintenance that towns and cities are faced with.

The large commuter rail system that Metro has planned and want to build at an accelerated pace also has that risky burdensome look to it. After it would be built at an accelerated pace would it really be used? And then what happens to that under funded period to transportation improvement that follows the accelerated building period when debt is being paid off? That is when really difficult problems can arise and there is the lack of funding to deal with them.

It is also quite unbelievable that Southern California will attach themselves to a mobility form that requires so much transferring and great distances to be traversed to carry out normal daily living. With inexpensive electricity for electric vehicles and more compact communities with shorter trips to connect daily tasks, why would people submit to a hodgepodge of inconvenient disconnected trips? Southern California society should be given the chance to decide these issues; we need full disclosure that the fullness of time affords.

#### **04 SUSTAINABLE COMMUNITIES**

Sustainable Communities Strategy: Sustainable communities are necessary for Southern California to sustain itself, and growth is necessary to bring about adaptation of existing communities to become sustainable. One such approach refers to the case I have been building for the use of Flow Boulevards to bring about that adaptation of existing community urban form through land use growth and transportation improvement in corridors. The FB form also targets the majority of areas where trip generation is made and brings Intelligent Transportation System technologies to bear on the issues of SB 375 including that of GHG emissions. There is an incredible existing investment in the sprawl that persists throughout Southern California and this investment must be made to become efficient in terms of preservation, energy, job creation, productivity, lifestyle achievement, environmental and air quality. Whereas some might think it is becoming crowded, it really does not have to seem that way by moving up pedestrian circulation and places over the improving street transportation below with the use of architecture in order to enjoy the view and open space.

This is a natural and very affordable adaptation to low density existing development. Examples of this kind of organization can be seen in parts and whole already in Los Angeles. And by connecting the growth corridors to existing towns, work centers and cities it can reduce VMT by both proximity and improved energy utilization. The FB concept is also able to improve more densely built existing urban areas as found in the LA Basin. These opportunities may employ land use growth along with transportation improvement techniques or may use one or the other, land use or transportation improvement to solve an urban condition. As indicated below (Westside LA, Exhibit A), there are instances where the transportation improvement ability of FB can be used without land use growth to solve “out of control” congestion issues inexpensively. However the land use growth component can be a dynamic element in creating both walking “place” environments and with eliminating congestion in the urban context generally.

With the congestion that the City of Los Angeles and the County MTA has allowed to continue by not employing ITS strategies, it would seem that more pollution is now being made by inefficient vehicular movement than is being saved by rail transit usage. This is beyond the loss of “productivity time” and the loss of livability in impacted communities both residential and commercial.

## **Exhibit A;**

### **A Plan to Eliminate Westside Congestion**

The real prospect of eliminating congestion on the Westside is nearing a reality as existing approved projects (405/HOV lane and Expo line) and potential proposed projects are combined with them. The basic approach to eliminate the existing traffic congestion, since it primarily comes into the Westside from the north and south, is to add additional capacity to the 405 corridor and then as well to the I-10 corridor to connect to the City of Santa Monica. By that capacity improvement the Westside arterial network can be relieved of traffic and therefore the gridlock now experienced on both sides of these freeway corridors as well as the freeways themselves.

The weakest link in these corridors to be improved is the interchange connecting the 405 and the I-10. The freeway interchange traffic is constricted both in its flow-through capacity and turning movement capacity. From there the freeways are further constricted by merging movements on and off the freeways at the very high collection and distribution ramp movements affecting the freeways and adjacent arterial street flows.

The key to eliminating Westside congestion is by adding needed capacity in order to relieve the interchange, the freeways and the ramping operations by the addition of a one-way pair (three regular flowing lanes along with an exclusive BRT/HOV lane in each direction) Flow Boulevard (FB) as a frontage road to the 405 (proposed in a [study](http://www.flowblvd.com/index3.html) found at [www.flowblvd.com/index3.html](http://www.flowblvd.com/index3.html)). This improves the operations of the freeway and arterial network and is focused on balancing travel demand with infrastructure to essentially “fix what

is now broken". The intension is to limit the improvement to between the Sepulveda pass and Culver City and not to provide additional improved access to the Westside that might be a basis for yet more traffic attracting development that would put the Westside back into yet more congestion. At this time, the objective is to bring balance between existing land use attraction and Westside infrastructure and then maintain that balance through a strictly enforceable Community Plan.

Sepulveda Boulevard would provide the north flowing side of the FB. South of Pico, Sawtelle would provide the south flowing side of the FB. North of Pico, there are two alternative streets to provide southern flow between Wilshire and Pico. The Cotner Street alternative (east of the 405) as developed in the study and Beloit Avenue (west of the 405) the alternative simply mentioned in the study. As an up-date to the study, the Beloit alternative now has political pull since the VA potential subway station has been identified. The prior difficulty was to obtain right of way through the VA property. Now that there is desire to provide some kind of future connection to the east- west rail lines, which would include the VA subway station; political and economic "pull", could make the Beloit alternative the likely choice. North of Wilshire the FB would flow into the Metro "Sepulveda Pass" project, whatever that may work out to be. Note that the quick and low cost improvements being discusses here are more short term problem solving plans and do not involve the ambitious 10's of billions dollar price tags that Metro envisions for later projects.

Adding up the improved capacities in the 405 corridor would be 30,000 person trips (pt) with the new 405 HOV lane and with a Beloit FB connection (where no through connection exists between the Pico and Wilshire areas) it provides 80,000 pt of improvement at this area of the corridor. This would total an increased capacity of 110,000 person trips to be distributed to reduce congestion on the freeway, through the interchange, in the ramp use and out of the arterial network in the north-south direction. South of the interchange the increased capacity to the Sepulveda-Sawtelle pair would be about 38,000 pt/day due to BRT lanes and the synchronized vehicular flow in general. In the east-west direction the Expo Line would add approximately 35,000 pt, the I-10 improvements 60,000 pt and three sets of BRT (Wilshire, SMB and Olympic) giving an additional 20,000 pt totaling 115,000 pt of increased capacity to reduce congestion with.

The key to making the interchange work adequately is the reduced 405 through traffic volume and the potential to make direct connections from the freeways to the FB to reduce turning movement demand (such trips would be headed to or from the FB). This allows greater provision of freeway to freeway turning movement capacity by having two full lanes to turn with and not being merged into one lane going into and out of the turn ramps. This additional lane continuity allows about a doubling of turning movement capacity in the critical turns connecting the 405 and the I-10.

Operation of the FB requires priority signalization separate from the cross streets of the arterial grid. This priority is "earned" by the fact that the FB accommodates a higher volume of vehicles than an intersecting arterial would have, has the greater length of travel, presents the fact that the FB makes the freeway system work without failing, provides additional north-south to east-west turning opportunities between crossing arterials with the 405 and also takes travel

demand out of the arterial grid so it does not gridlock. While the north bound side of the FB needs to have synchronized signals, with for example one minute vehicle packs and one minute gaps between them (for cross traffic signal periods), likewise the south bound needs the same for continuous flow of the vehicle pack without stopping. The phasing of each side of the FB may be coincident at an intersection (both having green signal periods) or out of phase with each other in any amount that may be of some benefit to the crossing arterial. What cannot be allowed is the breaking of the flow of signal synchronization on either street of the FB pair. With a travel speed of approximately 40mph, this means that the automobile travel time between Wilshire and Culver is about 7 minutes on the FB and the BRT bus can take about 14 minutes using prepaid platform boarding and alighting techniques by staying at less than 1 minute at each arterial bus stop.

- Eliminating congestion is the first step in being able to remove ambiguity so as to stabilize the Westside and make Community Plans for improvements like livable boulevards and needed land uses that allows developers and residents to fully support.
- BRT bus transit works well with the Westside by having lines to and from the FB by connecting with the destinations of Westwood, Century City, Santa Monica, etcetera, without transfers; as well as connections to the future rail stations of the Expo Line, the LAX and the VA Station. And the BRT facilities can be up and running in just a few years.
- By stabilizing the land use and transportation balance, it would then be prudent to insist that City and County planning departments make comprehensive plans for the expected two million additional residents in the next 25 years. In other words, plan for additional development and population in other areas and not to allow excessive Westside development which yet again brings unbearable congestion.

December 4, 2011 by Phil Brown

email contact; [REDACTED]



February 14, 2012

Attn: Honorable Pam O'Connor, President of SCAG and Regional Council members  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**RE: Active Transportation in SCAG's 2012 Regional Transportation Plan (RTP)**

Dear Honorable O'Connor, Regional Council members and Policy Committee members:

On behalf of the Southern California Safe Routes to School Network and the signatory organizations and individuals to this letter, we would like to thank Southern California Association of Governments (SCAG) staff, Regional Council and Policy Committee members for the opportunity to participate in the 2012 Regional Transportation Plan (RTP). We recognize the multitude of efforts required to develop the long range plan and are appreciative of all of the hard work that has already been done.

The Safe Routes to School National Partnership is a national advocacy group representing over 500 organizations and professional groups that works to improve conditions for children to walk and bicycle to school.

Per 2009 National Household Travel Survey, 21 percent of all trips in the SCAG region are currently being done via walking and bicycling. And tragically, per SCAG 2012 Draft RTP, 25 percent of all roadway fatalities in the SCAG region are pedestrians and bicyclists. These are critical and dangerous trends that require our regional leaders to change the way transportation planning has been done for decades in Southern California. We encourage all regional leaders to implement this change starting with the 2012 RTP. The region does not need a plan that allocates \$22 billion on road widening and only \$6 billion on active transportation. It is imperative to change funding allocations to improve safety and public health throughout our region.

We ask that SCAG amend the Draft RTP/SCS to include the following:

1. Increase the overall percentage of RTP funds dedicated to active transportation from 1.3 percent of the 2012 RTP to 5-8 percent of the total 2012 plan. The request for 5-8 percent reflects the region's current mode split, collision trends, community interest and support, as well as current bicycle and pedestrian planning and implementation requirements, based on projections by the [Los Angeles County Department of Public Health \(LAC DPH\) Methodology](#) (released 12/2011). The LAC DPH determined in a rigorous study that the unmet regional funding need for a walkable and bikeable SCAG Region was close to \$40 billion. This represents roughly 8 percent of the total RTP budget, which is significantly larger than SCAG's proposed \$6B to address regional needs.

As local governments contribute resources to the construction of active transportation projects, all other funding sources for active transportation, such as the amount of RTP local (county sales taxes and other local revenues included in the 2012 RTP), state, and federal programming dollars, should be increased to aid these efforts. Additional state and federal funding will help cities do more with their local dollars, especially since often local funding is tied into federal funds.

As it stands in the draft 2012 RTP, eighty percent of the SCAG funds dedicated to active transportation investments in the 2012 RTP are not programmed until after 2026. Between 2016-2025, the funding for active transportation will be only one-half of the current annual 2012 budget. We encourage SCAG to prioritize active transportation funding and distribute these funds evenly over the 25 year period, which will bring the benefits of active transportation to fruition sooner for all communities.

While we encourage SCAG to increase funds to support Active Transportation, we recognize the constraints and importance of working with County Transportation Commissions (CTC's) to fast-track active transportation funding. We request the 2012 RTP include development of an Active Transportation Finance Strategic Plan by 2014 that identifies how each CTC is spending funds and the opportunities available for increasing funding for active transportation in each county during the next ten years. This plan ideally is developed by convening a *Regional Active Transportation Early Action Transportation Program* in which SCAG brings together each County Transportation Commission (CTC), elected officials and other stakeholders to discuss and prioritize what each County is doing regarding active transportation and funding areas which may be leveraged for the needed funding, for walking and bicycling and first mile/last mile projects, in the earlier stages of the 2012 RTP. We request that this Early Action Program have been adopted and include a 2014 implementation plan.

We have seen tremendous - and still growing - support and action from throughout the six-county region calling for policy makers to support and build walkable and bikeable neighborhoods. We encourage SCAG leaders to respond by supporting the impressive efforts underway throughout the region to create healthy and active communities for all.

2. Allocate Funding for Bicycle and Pedestrian Planning and Usage Counts: Improving the walking and biking environments in our region cannot be done without adequate planning at the local level. Unfortunately, many SCAG cities do not have bicycle or pedestrian master plans and project lists; in Los Angeles County, for example, only approximately 11 of 88 cities have bicycle master plans and only 4 cities have pedestrian plans. This lack of planning is a grievous impediment to improving infrastructure for cyclists and pedestrians. In addition, we must increase documentation of bicycle and pedestrian travel usage and demand by regularly assessing numbers of people walking and biking. Without such figures, it is difficult to forecast mode share and usage or measure the positive benefits of investments in these modes.
  - Identify funding sources in order to set aside at least \$19M in the 2012 RTP to support SCAG cities in developing bicycle and pedestrian master plans, safe routes to school plans and required, but overdue ADA transition plans. It is estimated that approximately \$200,000 per city is required to develop these plans (95 cities at \$200,000). Establish a goal of 50 percent of SCAG cities having completed at least one plan by 2016 in order to prepare for the 2016 RTP.
  - Create and fund a regional bicycle and pedestrian count program at SCAG establishing yearly usage counts at key locations in cities throughout the SCAG region. Use the data collected to establish trends, set performance goals, evaluate fund requests for facility improvements, prioritize improvements, and show the impacts of recent improvements. Set aside funds in SCAG's 2012/2013 OWP to create program and maintain this program in future years. (See [links: Nashville Metropolitan Planning Organization's program](#), [Technical Memorandum on Regional Pedestrian and Bicycle Count Procedures](#))
3. Adopt a Regional Complete Streets Plan by 2014: This plan will incorporate input from local jurisdictions to prioritize complete streets projects in programing efforts and dedicate a portion of system preservation and maintenance funding for improving the road conditions of all users.
4. Adopt a Safe Routes to School Regional Strategic Plan by 2014: Such a plan would be similar to the plan currently being adopted by SANDAG. In our region 14 percent of all morning congestion is caused by private car drop off at schools (*Traffic Injury Prevention*, August 2011). It is critical that transportation agencies look at the needs of the entire network when planning resource investments. SANDAG's Regional Safe Routes to School Strategic Plan works to establish a critical needs assessment for their Region on how students and their families currently go to and from school, creates data standards and guidelines, considers school siting and closures as possible land use strategies, bridges the gap between transportation planning agencies and school districts, and works to provide much needed technical assistance to local jurisdictions - with skill sets such as how to obligate federal Safe Routes to School funds in a timely manner.
5. School Siting and Joint Use Policies as land use elements of the SCS: School siting can often determine whether or not it is possible for children to walk and bicycle to school.

When schools are placed on the outskirts of urban areas it becomes necessary for children to be driven to school. As noted above, 14 percent of all morning congestion is caused by private car drop off at schools (*Traffic Injury Prevention*, August 2011). Therefore schools should be located within residential neighborhoods whenever possible and equitable to reduce congestion and increase opportunities for bicycling and walking.

Joint Use Policies allow school facilities such as playgrounds and recreational facilities to be used by the community when schools are not in session. This can open up recreational activities in neighborhoods that lack parks and open spaces. When schools are located within neighborhoods, community members can access these locations without the use of a private automobile which can lead to further reductions in congestion.

6. Set measurable safety and health goals for all users: Goals are set for the reduction of green house gases in the draft 2012 RTP/SCS. Active transportation plays a pivotal role in the reduction of these green house gasses. Similar measurable goals should be set for reducing crash rates for active transportation and for reducing the health impacts of obesity. These could include a report on the number of children walking and bicycling to school across the entire region as well as a report detailing access to parks, open spaces and quality active transportation networks.
7. Monitoring detailed population data and metrics in environmental justice communities: The analysis conducted by SCAG in the Environmental Justice Supplementary Report (“EJ Supp. Report”) provides detail on existing inequities in all modes of transit, housing, employment, environmental impacts, and health risks. The historical analysis in the Environmental Justice Supplementary Report confirms the challenges faced by the environmental justice population, as defined by SCAG:
  - longer commute times and distances than average,
  - vulnerability to gentrification and displacement from high quality transit areas (HQTA) or transit oriented communities (TOC),
  - higher proportional use of non-automobile travel, such as bus, rail, walk, and bicycle, and growth patterns concentrated within geographies of poor quality transit, lower housing costs, and fewer employment opportunities.

Concerns arise in the inconsistencies of the environmental justice analysis. SCAG’s analysis of travel time and travel distance savings shows “fairly similar and close” rates for all ethnic groups, including non-white Hispanics. Yet, the increase of transportation and infrastructure projects in HQTA/TOC will increase gentrification and displacement of environmental justice populations. The forecasted benefits for environmental justice populations are likely negated or overridden by predicted geographical shifts.

In order for SCAG to properly mitigate disparities in transportation, housing, and land use impacts in low-income and minority communities, it must monitor population changes by more detailed population segments (i.e. neighborhoods, census tract)

because root factors of inequities play out at these population segments. It is difficult to illustrate short-term impacts and long-term benefits on the environmental justice population without such details. For example, the continued poor job housing fit and balance in the SCAG region leave lower-income populations with no public or active transportation options in their daily commute. Metrics need to demonstrate immediate changes to transportation usage from ticket pricing, placement of rapid bus transit stops in high concentrations of lower-income and elderly groups, and safety programs for walking and bicycling. (see *link*: [Health Equity and Prevention Primer, Prevention Institute](#))

Additionally, SCAG should provide the tools and policies for local jurisdictions to develop strategies to reduce commute distances and relieve sedentary lifestyles for lower income and communities of color. Healthy, sustainable, and accessible place-making is crucial to the environmental justice population because geography and socioeconomic structure are influential predictors of obesity in the United States. Environmental justice populations must be ensured the opportunity to go to school, live, work, and play in all neighborhoods through land use strategies, incentives for businesses and developers, infrastructure and non-infrastructure programming, such as Complete Streets, first/last mile to transit, density bonus, parking reductions, safe and secure bicycle parking and street crossings, and affordable and work force housing in HQT/TOC. (see *link*: [Why Place & Race Matters, Policy Link](#))

SCAG does not adequately link RTP/SCS active transportation funding to its environmental justice obligations. The lack of active transportation funding disproportionately affects immigrant, lower-income, and minority populations because these neighborhoods have greater barriers to physical activity and transit access, higher numbers of busy regional arterial, poor pedestrian and bicycle infrastructure, unsafe neighborhoods, and lack of safe storage for bicycles and safe crossings. Thus, these neighborhoods would benefit from an increase in funding allocations (in order for SCAG to meet its Title VI obligations) and from a detailed strategic plan. (see *links*: [Do All Children Have Places to Be Active, Active Living Research](#); [Low Income Resource Guide, Safe Routes to School National Partnership](#))

Our policy requests are important commitments for creating robust networks for bicycles and pedestrians in the SCAG region, where walking and bicycling can be enjoyed by all with safety and ease irregardless of age or ability. Compliance with the SCS requirement of SB 375 and the well-being, safety, and health of citizens within the SCAG region will depend on the future development of our multi-modal transportation network, jobs, housing, education and healthy environments for families to live in.

We sincerely appreciate this opportunity to provide feedback for the 2012-2035 draft RTP/SCS. Please feel free to contact us with any questions or concerns; our contact information is listed below.

Respectfully Submitted,

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Organizational Endorsements:

1. Deborah Murphy, Founder and Director, Los Angeles Walks
2. Alexis Lantz, Planning and Policy Director, Los Angeles County Bicycle Coalition
3. Jonathan Lopez, Southern California Coordinator, California WALKS
4. Wendy Alfsen, Executive Director, California WALKS
5. Rachel Morris, Executive Director, VCCool – Ventura Climate Care Options Organized Locally
6. Ventura Bicycle Union
7. Wes Reutiman, BikeSGV, [bikesgv.org](http://bikesgv.org)
8. Cynthia Rose, Director, Santa Monica Spoke, Regional Chapter LACBC
9. Mark Elliot, Campaign Organizer, Better Bike Honcho & Bike Beverly Hills, [betterbike.org](http://betterbike.org)
10. Samantha Ollinger, Editor, Bike San Diego, [BikeSD.org](http://BikeSD.org)
11. Ruben Cantu, Program Director, California Pan-Ethnic Health Network
12. Pete Van Nuys, Executive Director, Orange County Bicycle Coalition
13. Mark Vallianatos, Policy Director and Adjunct Professor, Urban and Environmental Policy Institute, Occidental College
14. Richard Risemberg, Bicycle Fixation, Los Angeles
15. Eric Yesayan, Interim Executive Director, Walk Bike Glendale
16. Kara Sergile, RN, MPH, KWS Consulting
17. Lars Clutterham, Partner, [downeygreen](http://downeygreen)
18. Jeremy Cantor, Program Manager, Prevention Institute
19. Seth Strongin, Assistant Director, The City Project
20. Cesar Covarrubias, Executive Director, Kennedy Commission
21. Eric Weinstein, Member, LACBC Planning Committee
22. Anthony Tróchez, Higher Education & Organizational Change, UCLA
23. Kevin Burton, Cofounder, West Hollywood Bicycle Coalition
24. Martha Cortes, Health Policy Coordinator, Alliance for a Better Community
25. Herbie Huff, Bike Coalition at UCLA
26. Barbara Lott-Holland, Co-Chair of the Planning Committee, Bus Riders Union
27. Andy Au, member, People for Bikes & BikeSGV
28. Madeline Brozen, Program Director, UCLA Complete Streets Initiative
29. Gwendolyn Flynn, Policy Director, Community Health Councils, Inc.
30. Josef Bray-Ali, Founder, Bike Oven

Individual Endorsements:

31. Alice Strong, San Gabriel
32. Alex Budiman, Upland
33. Ivy Dulay, Manhattan Beach
34. Ray Shofler, North Hollywood
35. Mable Everette, RD, Inglewood
36. Ezequiel Gutierrez, Adelanto
37. Arye Gross, Glendale
38. Ryan Johnson, Glendale
39. Nathalie Winiarski, Glendale
40. Elise Kalfayan, Glendale



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Manager, Southern California Region and Infrastructure Issues

February 14, 2012

VIA Electronic Mail

Ms. Margaret Lin

Southern California Association of Governments

818 W. 7th Street, 12th Floor

Los Angeles, CA90017

**Re: Comments on the Draft 2012 Regional Transportation Plan (RTP) /Sustainable Communities Strategy (SCS)**

Dear Ms. Lin:

The Western States Petroleum Association (WSPA) is a non-profit trade association that represents twenty-six companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and five other western states. WSPA has been an active participant in air quality planning issues for nearly 30 years and helped pioneer the first use of atmospheric modeling in the mid-1980's. WSPA members have extensive facilities in the Southern California region and will be directly affected by the Regional Transportation Plan particularly as it provides inputs to the Air Quality Management Plan (AQMP) being prepared by the South Coast Air Quality Management District (SCAQMD).

WSPA recognizes the importance of the RTP/SCS and the AQMP as planning documents that will directly affect the future of industry and residents in Southern California. We understand that the primary stated goal of the RTP/SCS is to increase mobility for residents of the Southern California region. Generally, the RTP/SCS should recognize that while there will likely be a gradual transition towards alternative fuels use in the basin there will also continue to be prominent use of conventional low emission fuels and vehicles as well as hybrids.

The RTP/SCS is also a key component of the AQMP for Southern California which is especially important given the role that transportation plays in the region's air emission inventory. For this reason, our comments are focused on those policy proposals and assumptions in the RTP/SCS. For each issue, we provide a recommendation that will help the Southern California Association of Governments (SCAG) and the SCAQMD as they incorporate stakeholder input.

**An accurate and defensible goods movement growth forecast is a critical element of the RTP/SCS and AQMP; SCAG should consider a range of outcomes to better communicate potential economic and environmental impacts from this sector.**

The draft RTP/SCS pays considerable attention to economic and environmental impacts from goods movement. The plan reports that five major sectors contributed the majority of freight demand (i.e., manufacturing, retail trade, wholesale trade, construction and transportation and warehousing) and those sectors comprised \$253 billion, or 34% of the regional Gross Domestic Product (GDP). The RTP/SCS then reports that Southern California cargo throughput will increase from 14 million twenty-foot-equivalent-units (TEU) (2010 actual) to over 43 million TEU by 2035; an increase of over 200%<sup>1</sup>. The impact of that change on the regional economy would be very large given that SCAG is predicting overall regional GDP growth over the same period will be closer to 25%.

The goods movement forecast used in the draft RTP/SCS assumes little market impact from competition and, in particular, the expanded Panama Canal which is scheduled to open in 2014. Logistics and market forces which drive supply chain shipping decisions are variable and complex and while numerous studies have attempted to predict the impacts of an expanded Panama Canal on U.S. marine ports, there is no consensus as to how much market share (if any) might be lost by the San Pedro Bay Ports. The RTP appears to represent a “best case” scenario as the only scenario. If that estimate proves optimistic, then the plan will have overstated goods movement impacts on infrastructure, the environment (i.e., air pollution emissions) and the revenue generation potential (i.e., use fees) needed to pay for the expensive infrastructure and technology improvements envisioned under the plan. And regional economic benefits will also have been overstated.

**Recommendation:** The RTP/SCS should consider a range of possible growth factors for the goods movement sector (e.g., high, low). This “bounding exercise” would help decision makers and the public better understand how sensitive economic and environmental factors are to goods movement sector growth. Also, given that we are informed that ship emissions are temporally variable, the “bounding exercise” should also inform the AQMP emissions inventory and consequent air quality modeling. *It is especially important that SCAG validate the emissions baseline (e.g., the 2009-2011 actual emissions) so that the growth projections are based on “real” emissions rather than theoretical or modeled emissions from past exercises. This is made even more important because the initial “in-year” emissions are the basis for building future-year emission projections.*

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<sup>1</sup> Forecast is based on the 2009 San Pedro Bay Container Forecast Update commissioned by the Port of Los Angeles and the Port of Long Beach

**Proposal for zero/near-zero emission transportation technologies is ambitious; SCAG should clearly communicate assumptions used in the quantitative analyses. Again, the RTP and the AQMP should consider the implications of these assumptions on the growth (or decrease) of vehicle emissions.**

The draft RTP/SCS contains several “big” ideas, the most significant of which calls for regional commitment for the broad deployment of zero and near-zero emission transportation technologies. The plan states that the “*development of a world class zero emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life and to meet federal air quality requirements.*”<sup>2</sup> The RTP/SCS outlines an aggressive strategy for technology development and deployment to meet this objective “*in the 2023-2035 timeframe,*” but the detailed assumptions concerning timing are not explained.<sup>3</sup> The draft RTP/SCS acknowledges several challenges which will confront this plan including “*operational needs, integration of the technologies into the national rail system, federal safety requirements, and costs.*” But those are just the beginning given the myriad commercial, political, jurisdictional, planning and technology factors involved. Despite those challenges, SCAG proposes for Phases I, II and III to be completed in the next three years. Phase IV timing is then far less specific and stretches across several AQMP milestone years. Given the ambitiousness of this initiative and its importance to the AQMP attainment demonstration, stakeholders need to better understand SCAG’s assumptions concerning the implementation schedule for these technologies. Critical review of the RTP/SCS in the context of the AQMP is not possible without this information.

**Recommendation:** SCAG should publish the technical assumptions used in the draft RTP/SCS concerning assumed rates of deployment for: (a) zero emission transport for container drayage; (b) zero and near zero-emission trucks for regional transport; (c) electrified rail technologies; and (d) zero or near zero emission rail technology. The timing for these assumptions is critical to the AQMP attainment demonstration. In addition, the RTP should provide information on daily, monthly, or seasonal activity associated with these actions. Again, as stated previously, this information is critical to input into the emissions inventory and the air quality modeling.

**RTP/SCS as proposed will have significant impacts on the electricity sector; SCAG needs to consider those impacts.**

The draft RTP/SCS as proposed would radically change how transportation energy is delivered and used in Southern California with much of the regional transportation system being electrified. Trucks, trains, and numerous other pieces of the goods movement system would be electrified starting as early as 2016. Yet the draft RTP/SCS contains almost no discussion of the massive infrastructure needs, implementation challenges or environmental impacts, including emissions projections, which would result from this policy. The plan is actually dismissive of these issues:

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<sup>2</sup>Draft RTP/SCS Executive Summary, page 1.

<sup>3</sup>Draft RTP/SCS Goods Movement Appendix p. 33, Goods Movement Environmental Strategy and Action Plan.

*“Although some emissions would still be produced in electricity generation, power plants are highly regulated and release less emissions. Furthermore, all power plants in the SCAB are natural gas powered, and also release fewer emissions. Most power plants are located outside the SCAB and therefore emissions from these sources will be further from population centers.”<sup>4</sup>*

That statement may have been partially accurate in the past, but it will not necessarily hold in the future as utilities consider how to meet significant new energy demands in a reliable and safe manner. The electricity sector is a highly complex system in technical and commercial terms and it simply may not be able to deliver the quantities of electricity on the timetables presumed in the RTP/SCS.

California’s electric utilities find themselves at a crossroads in terms of how utilities operate and are already having to revamp their power generation, transmission and distribution portfolios to accommodate a variety of environmental mandates including AB 32. Those mandates present numerous environmental, commercial, engineering and infrastructure demands. The issues and potential economic and environmental impacts need to be disclosed to decision makers and the public.

**Recommendation:** The RTP/SCS needs to fully consider the electricity sector infrastructure needs, implementation challenges and emissions impacts that would result from the policy recommendations contained in the draft plan. These emission impacts will be significant in scale and may impact the feasibility of RTP/SCS measures, particularly the schedules. These data are essential to proper development of the AQMP and the air quality modeling used by the SCAQMD.

Please contact me at 310-808-2144 or [psenecal@wspa.com](mailto:psenecal@wspa.com) if you would like to discuss or need additional information.

Sincerely,



Manager, Southern California Region and Infrastructure Issues

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<sup>4</sup>Draft RTP/SCS Goods Movement Appendix, page 42.

# NOTICE

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## INTERNATIONAL COUNCIL ON LOCAL ENVIRONMENTAL INITIATIVES

ICLEI is a United Nations-sponsored group which designs and writes policy for your area on land use, energy goals and measurement, and water usage. ICLEI is a paid consultant and/or receives dues from your taxes. ICLEI was formed after the United States (George Bush, Sr.) and 178 other nations met at the UN Rio Earth Summit in 1992 and agreed to use certain principles as their guidelines. Those guidelines include major reductions in energy and water usage, and huge increases in the number of living units in city centers. This is called UN Agenda 21-Sustainable Development.

In 1993 President Clinton formed the President's Council on Sustainable Development and gave a multi-million dollar grant to the American Planning Association to write *Growing Smart: A Legislative Guidebook* to bring UN Agenda 21 to the United States. Smart Growth was the result. Multi-story condos or apartments over small retail with little parking, crammed in your town center. Some people like that, but many of us should not be manipulated to live there. The reason for this style of construction is that, as UN Secretary General Maurice Strong said, 'the affluence of Americans is a threat to the planet.' Single family homes are a threat. Most of us love and can afford to maintain detached homes.

Across the nation, in large cities and small towns, like this one, identical programs are being rolled out. Land use restrictions, ordinances reducing energy usage, Smart Meters, school programs, & candidate trainings, are designed and implemented without your vote. You may be invited to city visioning meetings, but the outcome is decided before you enter the room.

Using ICLEI greenhouse gas emissions goals, your local government is in the process of controlling where and how you live, what you eat, what your children learn, and what laws you will live under. With the cover of 'environmental concern' your personal rights are being restricted. Soon, you will lose the right to travel freely without being asked for your ID. Lose the right to water your garden. Lose the right to refuse a Smart Meter. Lose the right to live in a rural area. Lose the right to drive a private vehicle. Under the guise of 'Sustainable Development' your property and civil rights are being systematically eliminated.

## Response to SCAG

Greetings SCAG, Cyrus Hojjaty here and I arrived at your meeting and voiced my concern over the 2035 General Plan and SB 375. Despite the fact that it is true that some people enjoy living in mixed-use buildings, take mass transit, and walk to their daily needs, this plan not only does not meet the needs effectively of those individuals, but does not meet the demands of others. Many of these plans are costly, unnecessary, and invade peoples lifestyles whether they choose to change or not.

It seems understandable that many of the policies that SCAG is trying to implement are trying to reverse the policies that were created by the coded car-dependent cities since the 1930s. It is true that many of these urban policies have understandable concerns, however at least the most important benefit is that many people are able to get single-family homes and some free-flowing traffic. We must preserve these benefits instead. What is so depressing that even though SCAG criticizes the car-dependent lifestyle we currently have, it was heavy intervention that created the system in the first place! As a matter of fact, many of these areas involving strip malls, collector roads, housing subdivisions, etc... were heavily manipulated by codes, regulations, and subsidies.

So basically the association does not want to admit that the system was caused by heavy intervention and yet they act like as the "saviors" to this problem to bring even more intervention. Sadly, many do not understand because of the different "buzzwords" and looks of the project. Give me a break! We are not mice! We are humans! We are not supposed to be treated in lab experiments whether it is a car-dependent landscape or a high-density packed environment!

What is deceptive and problematic, is that events are used to manipulate the decisions of the citizens. People are wrongfully being concerned over resource-depletion and man-made climate change. These concepts have heavily been debunked by many scientists and yet the temperatures have even rising in other planets as well! Do we really have to trample down on people over a belief that is heavily flawed? This does not sound like improving the lives of the many to me! Besides, we so much land available left in Southern California. With so much vast miles vacant land, why can't alternative town complex get built instead that **COMPETES** with what we have instead of monopolizing? I mean even if the 2035 was a wonderful approach, there is no need for monopolies. Urban planning is not a natural monopoly. In fact, during the meeting I display an alternative plan that does instead compete. SCAG should probably learn from a 19 year old, who has not even been to school to study urban planning!

Many of your projects in SCAG listed for Orange County are quite concerns yet some necessary. For land-use, let the developers and the marketplace decide if the mixed-use designs are necessary. Loosen up zoning codes to let people decide whether it will be strip malls, attached homes, office strips, or mixed-use. Of course you do in some areas want to restrict development like industry, toxic waste dumps, etc... For goodness sake, do not add any regulations, codes, get huge subsidies, and threat public and private property. My suggestions for the highway improvements and upgrades are letting construction occur when the REAL unemployment rate (Not CPI junk) for Orange County dips below 8.5%. I defiantly opposed to unnecessary projects like the high speed rails, road tolling, smart streets, rapid connectors, and the high-frequency Metrolink (unless if the ridership is high.)

Thank you for letting me to deliver my comments and suggestions. Hope to see SCAG associates soon in person.

-Cyrus Hojjaty

Long live Cyrus Planning! Oh yeah!

KICK ICLEI OUT.

HOW COME NOBODY ASKED ME IF I WANTED TO PAY DUES TO ICLEI?

They didn't have to. That's right. When your city or county (or both) became a member of the International Council on Local Environmental Initiatives-Sustainable Development there was no need to ask for your permission.

Is your town a member?

[http://www.freedomadvocates.org/images/pdf/iclei\\_usa\\_easy%20read\\_050511.pdf](http://www.freedomadvocates.org/images/pdf/iclei_usa_easy%20read_050511.pdf)

But remember—even if you don't see your community on that list you are still being influenced by standardized programs, grants, training and plans funded and designed by ICLEI to influence and change government policies to bring them into compliance with United Nations Agenda 21. They call it the Agenda for the 21st Century. This is a plan for global governance. That means that you and your community will be required to meet arbitrary goals set by an unelected body—one that you have never heard of, but that your city pays dues to, and that claims to speak for you and over 590 million people worldwide.

Across the nation hundreds of cities and counties are dues-paying members of ICLEI. Your property tax, income tax, and transportation tax dollars are paying for trainings, seminars, and sample legislation/ordinances. These policies are being enforced in your town. This is a whole life plan involving your educational system, your energy system, your government, your food production, your transportation, and your health. You are considered a threat to the planet and your life choices must be restricted.

- Do we support conservation? Yes.
- Do we support loss of civil rights to achieve environmental goals? NO.
- ICLEI is the implementation arm of UN Agenda 21
- ICLEI fuels the fear
- ICLEI pressures the community
- ICLEI sets the goals for greenhouse gas reduction
- ICLEI monitors the progress
- ICLEI directs your land use planning
- ICLEI controls your transportation dollars
- ICLEI is an unelected private group that your government belongs to.
- ICLEI operates secretly
- ICLEI is changing your life NOW
- KICK ICLEI OUT!

Find out how at: [www.PostSustainabilityInstitute.org](http://www.PostSustainabilityInstitute.org) and [Youtube.com/Cyrus992](https://www.youtube.com/Cyrus992)

Questions or Comments: Contact Cyrus Hojjaty at [Cyrus992@yahoo.com](mailto:Cyrus992@yahoo.com)



DEPARTMENT OF PARKS AND RECREATION

Inland Empire District • 17801 Lake Perris Drive • Perris, CA 92571  
(951) 443-2423 • FAX (951) 657-2736

Ruth Coleman, Director

February 14, 2012

Jacob Lieb  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan and Sustainable Communities Strategy and Draft Program Environmental Impact Report (SCH# 2011051018)**

Dear Mr. Lieb:

We appreciate the opportunity to comment on the above-mentioned project. We look forward to any necessary coordination and remain committed to working with you to successfully implement your project.

State Parks is a Trustee Agency as defined by the California Environmental Quality Act (CEQA). State Parks is also a Responsible Agency as defined by CEQA because the proposed project would occur within and require permanent use of Chino Hills State Park. State Parks' mission in part is to provide for the health, inspiration, and education of the people of California by preserving the state's extraordinary biodiversity and creating opportunities for high quality outdoor recreation.

**Environmental Mitigation Program**

We appreciate the advanced mitigation component in the RTP/SCS. Orange County's Renewed Measure M has had great success with a similar program. Programs such as these have many benefits including streamlined permitting, preservation of important natural lands, improved relationships and collaboration with resource and permitting agencies.

We offer the following suggestions regarding the Conservation Policy:

1. Ensuring State conservancies and joint powers authorities with a conservation focus are included in the mapping and prioritization of conservation lands. Specifically, we recommend including the Wildlife Corridor Conservation Authority, Puente Hills Habitat Preservation Authority, San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy, Mountains Recreation and Conservation Authority (MRCA), and Santa Monica Mountains Conservancy (SMMC) among the entities upon whose expertise can be tapped.
2. Extending the inventory of protected lands to include all protected lands – Federal, State, regional and local natural lands – instead of narrowly limiting the inventory to simply Natural Communities Conservation Plan and Habitat Conservation Plan areas.
3. Ensuring existing wildlife corridors and habitat linkages and highway/roadway undercrossings are protected and enhanced during the evaluation of habitat lands and during construction of roadway projects.

4. Advocating that the advanced mitigation policy result is a net environmental benefit for the natural resource lands after construction activities are completed.

Also, large-scale acquisition and management of lands must not be limited to “critical habitat,” (RTP, p. 76, 128) as this can be confused with the legal term used by U.S. Fish and Wildlife Service for some federally endangered and threatened species. To clarify, this should be replaced by text reflecting the intent, i.e., the best available natural lands with valuable environmental resources deserving of conservation/preservation. State Parks looks forward to working with Southern California Association of Governments (SCAG) on the development of the Natural Lands Acquisition and Open Space Conservation Strategy. This will protect remaining resource lands and mitigate for impacts from transportation improvements. In addition to mitigation banking, transfer of development rights (TDR), and payment of in-lieu fees, State Parks recognizes conservation easements as a powerful preservation tool for habitat areas. Conservation easements, and fee title transfers to open space park agencies, should be listed in the plan alongside the other preservation mechanisms.

#### **Wildlife Crossings of Transportation Facilities**

State Parks appreciates SCAG’s recognition of the impact that linear transportation facilities have on natural areas and the need for well-designed wildlife crossings to partially mitigate these effects. Wildlife crossings serve two distinct purposes: reducing mortality and preserving genetic connectivity. Roads are the leading direct source of human-caused mortality for most species in southern California and the entire country. They can become a population sink if a significant fraction of a local species is killed, affecting broader population distribution across the landscape. Additionally, for highly mobile predators, individuals crossing roads are frequently dispersing from their home range in search of new territory and mates, a vital population dynamic that is devastating if interrupted. National Park Service research has documented significant genetic differences among carnivore populations on either side of the 101 Freeway in the Santa Monica Mountains.

Wildlife crossings need to be discussed in the context of habitat connectivity, which is the broader ecological goal for conservation areas. Wildlife crossings are but one critical tool to ensure that indicator species are able to safely move about their environment. While much has been learned about movement patterns and the way in which key transportation facilities create genetic barriers to connectivity, the measures that might mitigate these impacts have not been thoroughly researched. Wildlife corridor design is a field in its infancy with few scientifically verified best practices for crossing dimensions and landscape features. Given that this research is needed to properly mitigate transportation impacts, SCAG should invest in connectivity research with a program specifically designed to establish measures that can be incorporated into the 2016 RTP revision. Such a program would aggregate existing research, propose new study areas, and develop design best practices specifically tailored to the Southern California eco-region.

#### **Comments on Proposed PEIR Mitigation Measures**

##### *Biological Resources and Open Space*

The PEIR includes many mitigation measures for potential impacts to biological resources. Overall, these measures are comprehensive and based on sound practice. Inclusion of the proposed mitigation measures in project selection and design will greatly improve ecological

outcomes in the SCAG region compared to a baseline scenario. The specific measures calling for minimum mitigation ratios reflect current accepted practices without limiting the discretion of resource agencies to require greater mitigation if warranted. The proposed measures addressing habitat fragmentation and connectivity are thorough and appropriate (MM-BIO/OS36 through MM-BIO/OS40). These impacts have been all too often unmitigated for transportation projects in the past.

State Parks looks forward to collaboration on regional conservation planning policy to address cumulative impacts to biological resources (MM-BIO/OS45). MRCA is one agency in the SCAG region that administers a highly successful restoration and preservation in-lieu-fee mitigation programs in close coordination with state and federal resource agencies. SCAG's planning and funding expertise is a welcome addition to ongoing efforts. State Parks recommends that other agencies with expertise in the region, such as WCCA, MRCA, SMMC, and Puente Hills Habitat Preservation Authority be invited to participate in this process.

The primary impact from transportation facilities is often the indirect and cumulative impact from growth induced by new improvements. As projects increase access and reduce commute times from remote areas, these resource lands become economical to develop. State Parks is therefore pleased to see SCAG recognize these impacts and call for their mitigation (MM-BIO/OS47). Without appropriate growth management along transportation corridors, wildlife crossings cannot mitigate connectivity impacts from expanding development footprints. Furthermore, induced growth along new corridors often negates the benefits of new transportation capacity, prompting even greater impacts from future facility expansion. SCAG should develop best practices that would be applicable to new transportation corridors to prevent new development from extending into resource lands. The PEIR biology mitigation measures should be clarified to delete reference to relocating active nests (MM-BIO/OS35), as this is likely in conflict with the Migratory Bird Treaty Act. Instead, construction buffers to active nests should be established, as proposed.

#### *Public Services and Utilities*

The PEIR lacks a public safety mitigation measure that promotes project design that minimizes urban-wildland interface, which is the source of wildfire risk to persons and property. Past development patterns include long, meandering urban edges with high risk exposure to catastrophic events, causing great strain on local and State firefighting resources largely subsidized by those living in lower risk locations. A mitigation measure should include two components addressing both project location and project design. First, development that extends into high fire hazard areas should be discouraged. Second, there should be an emphasis on utilizing project design strategies to reduce risk, such as building within compact and defensible footprints and minimizing perimeter length. Projects should be sited in order to reduce impacts of required brush clearance on native habitat areas, including adequate buffers to protect sensitive resources from brush clearance impacts.

State Parks concurs that project sponsors and local jurisdictions should work to increase public access to open space (MM-PS21 and 26). River parkways and other urban natural parks serve a vital purpose in connecting urban residents to natural parkland (MMM-PS22). The City and County of Los Angeles have both recognized these projects in master plans for their respective river corridors. While planning for these projects is the responsibility of local jurisdictions and partners, SCAG has a critical responsibility for funding by including bikeway projects in the RTP

area. Regional partnerships are necessary to achieve open space conservation objectives (MMPS29). State Parks welcomes SCAG's assistance with planning and identifying funding sources for open space acquisition (MM-PS31 and 34). SCAG's participation in coordinating regionally significant trail networks is also appreciated, however the greatest contribution SCAG could make to these efforts would be including those greenways that serve transportation functions, such as the river parkways, in the RTP so that they can be fully developed in the short and medium-term (MM-PS33).

#### *Water Resources*

State Parks also believes that preservation of remaining riparian resources should be the highest priority at both the regional and project level, followed by restoration of previously impacted areas (MM-W1 and 9). To the extent feasible, natural methods for stormwater control, water quality improvements, and infiltration should be encouraged. SCAG sets an appropriate standard that new projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters (MM-W22). When evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in Notice of Preparation and Environmental Impact Report responses. This is a critical issue wherever natural rivers interact with urban areas. SCAG should participate in the development of models of natural processes for the remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information.

Thank you again for considering our comments. Please keep our agency on your email/ mailing lists for this project. For further discussion, please contact me or Enrique Arroyo at (951) 453-6848.

Sincerely,



Ron Krueper  
District Superintendent

cc: Jay Chamberlin, DPR Chief of Natural Resources  
Wildlife Corridor Conservation Authority



## California Natural Gas Vehicle Coalition

February 14, 2012

Ms. Margaret Lin  
Southern California Association of  
Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, California 90017-3435

**Re:** SCAG's 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Lin:

I am writing on behalf of the California Natural Gas Vehicle Coalition to provide comments on the Southern California Association of Governments' (SCAG) 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The California Natural Gas Vehicle Coalition (CNGVC) is an association of natural gas vehicle and engine manufacturers, utilities, fuel providers and fleet operators serving the state. We work with legislators and regulators to develop policies that will increase alternative fuel and vehicle use, support new initiatives and provide up-to-date information on NGV technology and market developments.

Our primary concern is that the draft plan largely ignores natural gas as a transportation fuel and its potential to be a significant part of the solution for the region's transportation, air quality, and sustainability goals. By focusing almost entirely on "zero-emission" vehicles we believe SCAG is missing the opportunity to develop a strategy that achieves the same benefits in a shorter time frame and for significantly less cost.

Over the last two decades we have seen in California that it is very difficult to predict which technology will succeed and even more difficult to say when they will achieve significant market penetration. That is why more agencies and companies are taking a portfolio approach to developing and deploying clean transportation technologies.

Natural gas should be an integral part of your Regional Transportation Plan. Natural gas is a very clean fuel, available today for half the price of diesel, and it is abundant in North America. This is why the medium- and heavy-duty vehicle markets in particular are embracing natural gas like never before. Many public and private fleets are investing in natural gas vehicles. Transit agencies, taxi fleets and private companies such as Waste Management; United Parcel Service, AT&T, and Verizon have purchased thousands of small, medium, and large natural gas vehicles.

The heavy duty vehicle sector seems to show the greatest promise for natural gas because of the fuel cost savings over diesel and the lack of other viable alternatives to diesel. Recently Swift Transportation, one of the largest trucking companies in the country, said they would be investing heavily in natural gas trucks and could reach 30%-40% penetration in their fleet in 3-4 years.

Be careful about "zero-emission". The term is used a bit too freely these days. Using life cycle emissions analysis California has found that zero-emissions at the tailpipe are only part of the picture. It is important to consider the whole picture including upstream emissions from production and transportation of fuels. Some are trying to draw a bright line between "ZEV fuels and technologies" and "non-ZEV fuels and technologies". We do not see a bright line now and to the extent that there is a line we see it fading over time. Natural gas vehicles are near-zero emissions today and are getting cleaner with each generation of engines. Biomethane (aka renewable natural gas) has been identified as one of the cleanest transportation fuels by the California Air Resources Board. Renewable Natural Gas has 90% less carbon emissions than gasoline. Sources include landfills, agricultural operations like dairies, and waste water treatment plants. Whether it is used on its own or blended with conventionally natural gas it is likely to be one of the cleanest fuels in transportation over the next couple of decades.

For these reasons we ask you to revise your plan to include natural gas as a meaningful part of the solution.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Tim Carmichael". The signature is written in a cursive, flowing style.

Tim Carmichael  
President



City of  
**SANTA CLARITA**

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196  
Phone: (661) 259-2489 • FAX: (661) 259-8125  
[www.santa-clarita.com](http://www.santa-clarita.com)

February 10, 2012

Laurie Ender  
Mayor

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

Frank Ferry  
Mayor Pro Tem

SUBJECT: 2012 DRAFT REGIONAL TRANSPORTATION PLAN

Bob Kellar  
Councilmember

Dear Mr. Ikhata:

Marsha McLean  
Councilmember

On behalf of the Santa Clarita City Council, I am writing to request that the Orange Line Development Authority's Northern Corridor be included within Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP) Constrained Projects List.

Laurene Weste  
Councilmember

The Orange Line Development Authority (OLDA), of which the City of Santa Clarita is a member, is committed to the development of a high speed, grade separated, environmentally friendly and energy efficient transportation system. In recent months, the OLDA Northern Corridor, from downtown Los Angeles to Santa Clarita, has been the focus of intense review and investment. These activities position OLDA's Northern Corridor to be placed within the Constrained Projects List, as opposed to the RTP's Strategic Plan.

Los Angeles County Metropolitan Transportation Authority (Metro) is currently conducting the Antelope Valley Line Infrastructure Improvement Strategic Plan. This plan anticipates the identification of specific projects, which can be undertaken in the corridor to enhance service and safety. This study will be completed in spring 2012.

The Regional Council's approval earlier this month of a Memorandum of Understanding (MOU) with the California High Speed Rail Authority and transportation commissions paves the way for placement of the statewide high speed rail project within the RTP Constrained Projects List, as the alignment for the high speed rail project falls within the OLDA Northern Corridor. Furthermore, the \$1 Billion included within the Memorandum of Understanding contemplates expenditures within the OLDA Northern Corridor during the 2012 RTP horizon. It is also widely anticipated that some of the recommendations identified in the Antelope Valley Line study will also be incorporated into the project list that serves as the implementation of the MOU.



Mr. Hasan Ikhata, SCAG Executive Director  
February 10, 2012  
Page 2

Finally, the Ground Access Study being conducted by the Burbank-Glendale-Pasadena Airport Authority and OLDA focuses on multi-modal transportation improvements that will enhance the linkage between the airport, the OLDA Northern Corridor, and communities, such as Santa Clarita, located within the corridor.

Clearly, the current study activity along the OLDA Northern Corridor, coupled with specific inclusion of the California High Speed Rail Authority's proposed project along the same corridor, demonstrates that the OLDA Northern Corridor meets the criteria for being included within the RTP Constrained Projects List. Within the foreseeable future, it is reasonable to conclude that significant investments will likely be made in the corridor, in conformance with SCAG's criteria for inclusion of projects within the Constrained Project List

On behalf of the Santa Clarita City Council, I encourage SCAG staff and the Regional Council to include the OLDA Northern Corridor within the 2012 RTP Constrained Projects List. Should you or your staff require additional information regarding this request, please contact me or the City of Santa Clarita Intergovernmental Relations Officer, Michael Murphy, at (661) 259-2489.

Sincerely



Laurie Ender  
Mayor

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cc: Members of the City Council  
Council Member Frank Quintero, OLDA Chairman  
Mayor Mario Hernandez, SCAG District 67 Representative  
Ken Pulskamp, City Manager  
Robert Newman, Public Works Director  
Michael Murphy, Intergovernmental Relations Officer



Tuesday, Feb. 14, 2012

President Pam O'Connor and Members  
 Southern California Association of Governments  
 818 W. Seventh Street, 12th Floor  
 Los Angeles, CA 90017

Dear President O'Connor and Regional Council Members:

The health and medical community wishes to thank the Southern California Association of Governments (SCAG) staff for their hard work on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and for recognizing that the decisions made in the planning process ultimately affect public health and air quality. We are especially pleased to see the inclusion of some of the health and equity indicators that we championed in our comment letters (May 6 and Aug 26) captured in SCAG's performance measures. While we believe the draft plan under review has many positive elements, we also believe strengthening measures are needed to assure that strong public health benefits are achieved through the plan.

The serious air pollution and health problems experienced in the Southern California region require strong action to transform transportation and land use planning. The Los Angeles region continues to be rated as the most polluted area for ozone in the country by the American Lung Association and the public health toll remains high. The Inland Empire continues to bear the brunt of this pollution due to weather patterns that concentrate pollution in the area leading to more severe health impacts.

Research by the American Lung Association in California quantified the respiratory health benefits of smart growth strategies in the Southern California region. This analysis showed that the **six-county Southern California region could avoid over \$16 billion in cumulative health and societal costs** through smart growth strategies that reduce the growth in the region's vehicle trips by 20 percent by 2035. While large, these benefits may represent a small fraction of the greater benefits that accrue with more physically active transportation options, as envisioned and quantified by the California Department of Public Health's I-THIM modeling

project. Understanding the potential benefits of given planning scenarios will help to identify plans that provide the greatest reductions in harmful emissions and chronic illnesses.

Health experts have continued to speak out through workshops, hearings, joint letters and the media about the devastating toll of respiratory illness, obesity, diabetes, and heart disease caused by our car-dependent community designs throughout the Southern California region and about the need for greater focus on a shift to active transportation modes like walking, cycling and transit that reduce pollution emissions and gets people out of their cars and into a more physically active lifestyle.

We offer the following comments and recommendations to ensure that the Sustainable Communities Strategy and future transportation investments place sufficient emphasis on promoting active transportation modes and transit oriented development, measuring and improving health progress, and ensuring that health and equity are imbedded in the decision making process for this plan and future planning efforts.

### **Key Health Recommendations for SCAG SCS**

- **Increase active transportation investments to more than \$12 billion a year.** While we appreciate the increase in active transportation funding included in the draft SCS, we believe more funding is needed. A recent study by the Los Angeles County of Public Health estimated that up to \$40 billion could be needed to build out all of the current bicycle and pedestrian projects in Los Angeles County alone. SCAG, in coordination with health departments and organizations, should conduct a comprehensive needs assessment for the Southern California region to determine the infrastructure needs to develop a network of bicycle and pedestrian pathways and transit connections. Analysis is also needed of how SCAG's bicycle and pedestrian per capita investment compares with other regions.
- **Improve Assessment of health benefits through new modeling approaches.** Utilize the new California Department of Public Health I-THIM screening tool to analyze the potential chronic disease reductions that can be achieved in the SCAG region based on increased transportation-related physical activity such as walking and biking. This model was used in the San Francisco Bay Area region to determine reductions in heart and respiratory disease, breast cancer and other health effects linked to active transportation scenarios. We urge SCAG to incorporate this tool in regional planning and decision making for transportation investments.
- **Include the attached list of 13 health and equity metrics in the SCS and monitor over time, including expanded public health targets.** In addition to monitoring premature mortality, SCAG should also assess reductions in asthma incidence and exacerbations due to traffic related pollution (NOX) and other targets through collaboration with local health departments, the South Coast Air Quality Management District, academic researchers and community based organizations. Improvements to the targets should be monitored and reported to the public every two years. *Additional comments on the targets already included by SCAG in the SCS will be sent in a separate comment letter.*

- **Focus investments on completing transit systems** and building out transit infrastructure, rather than highway expansion, including the following:
  - Doubling Metrolink ridership by 2020 and double it again by 2035
  - Expanding Bus Rapid Transit and regional bus service
  - Enhancing TOD planning and 1<sup>st</sup>-mile-last-mile investments near Metrolink stations
  - Doubling the bicycle network to 24,000 miles and improving pedestrian environment
- **Increase transit and transit oriented planning in Inland Empire.** Because so much of the planned growth in the Inland Empire is relatively low density and remote from transit, SCAG should work closely with Inland Empire governments to accelerate expansion and frequency of transit and rail to the area and focus more growth around transit corridors. A recent health forum hosted by the American Lung Association in California in Riverside highlighted the dramatic rates of respiratory illness, heart disease and obesity in the region associated with poor land use and sprawl development.
- **Front load active transportation funding.** SCAG should commit to a higher amount of transportation funding for bike and pedestrian infrastructure, especially in the early years of the 25-year RTP process. SCAG should work with local transportation agencies to prioritize bicycle and pedestrian projects and ensure the majority of funds are spent prior to 2020.
- **Increase investments in zero emission freight transportation** in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards. Ensure that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies and infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially those living along freeways and freight corridors.
- **Evaluate the number and type of new developments** that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP and potential pollution exposures. The Environmental Justice Appendix to the Plan shows that approximately 25% - 27% of households living within 500 feet of freeways could face greater exposures to CO and PM than under the base case, with high concentrations of minority and low income residents disproportionately affected. Work with air district, health departments and universities to develop and implement best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.

As health and medical organizations and professionals, we recognize that strong government policies to control harmful emissions and that dramatically increase options for active transportation are critical to improving public health and quality of life in Southern California. We stand ready to assist you in implementing a truly health protective, equitable and sustainable plan for Southern California.

Signed,

Kathy Magliato, MD  
Board of Directors & Volunteer  
**American Heart Association**

Bonnie Holmes Gen  
Executive Director for Air Quality and Public Health  
**American Lung Association in California**

Robert Vinetz, MD and Anne Farrell-Sheffer, MPH  
Co-Chairs  
**Asthma Coalition of Los Angeles County**

Zachery Scott  
Director of Programs  
**Asthma & Allergy Foundation of America,  
California Chapter**

Ruben Cantu  
Program Director  
**California Pan-Ethnic Health Network**

Maya Golden-Krasner  
Staff Attorney  
**Communities for a Better Environment**

Maxwell Ohikhuare, MD  
Health Officer  
**County of San Bernardino | Department of Public Health**

Rachelle R. Wenger, MPA  
Director, Public Policy & Community Advocacy  
**Dignity Health (Formerly Catholic Healthcare West)**

Jocelyn Vivar Ramirez, M.P.H.  
Research & Policy Analyst  
**East Yard Communities for Environmental Justice**

Jonathan Heller, PhD  
Executive Director  
**Human Impact Partners**

Dolores Gonzalez-Hayes  
Director of Policy  
**Latino Health Access**

Jessica Tovar, MSW  
Project Manager  
**Long Beach Alliance for Children with Asthma**

Alexis Lantz  
Planning & Policy Director  
**Los Angeles County Bicycle Coalition**

Jeremy Cantor, MPH  
Program Manager  
**Healthy Places Coalition  
Prevention Institute**

Ricky Choi, MD, MPH  
Chair  
**National Physicians Alliance – CA**

Patricia Ochoa  
Environment and Health Coordinator  
**Physicians for Social Responsibility – LA**

Pauline Chow, Esq. Southern California Policy Manager  
Rye Baerg, Southern California Policy Manager  
**Safe Routes to School National Partnership**

Jim Mangia, MPH  
President & CEO  
**St. John's Well Child and Family Centers**

Dr. Robert Ogilvie, PhD  
Program Director, Planning for Healthy Places  
**Public Health Law and Policy**

Anne Kelsey-Lamb, MPH  
Director  
**Regional Asthma Management and Prevention**

Luis Pardo  
Executive Director  
**Worksite Wellness LA**

**Individuals**

Gary Melton, RN, MBA  
Director of Health Administration  
Inland Empire Health Plan (IEHP) \*

Karen Jakpor, MD, MPH  
American Lung Association in California volunteer  
Riverside

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# SB375 Health & Equity Metrics

## SB375: Sustainable Communities Strategies for Regional Transportation Planning

With the goal of reducing greenhouse gas emissions, SB375 requires that California's Metropolitan Planning Organizations (MPOs) prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP). The SCS process is an opportunity to improve the health of all communities in the state, truly ensuring our sustainability.

### Performance Metrics and Planning

MPOs use a variety of performance measures to assess different scenarios for land use and transportation changes. As we have seen in the past, if those metrics don't include health and equity measures, it is unlikely that the final selected plan will lead to healthy and equitable outcomes. For example, if MPOs use the indicator "Automobile Level of Service (LOS) on Roadways," their decisions will focus on making driving easier, which might not be the best for health given the many ways driving can harm health. If instead they use "Premature Death due to Traffic-Related Pollution," then their plans are more likely to decrease traffic-related pollution by promoting alternate forms of transportation. Our goal is to provide MPOs a set of metrics that will promote health and equity as well as sustainability.

### Developing the Health and Equity Performance Metrics

To develop a list of health and equity metrics, Human Impact Partners, an Oakland-based non-profit that strives to transform the policies and places people need to live healthy lives, received funding from the Resources Legacy Fund and worked in collaboration with:

- American Lung Association in California
- Bay Area Regional Health Inequities Initiative
- Climate Plan
- Fehr & Peers
- Healthy Places Coalition
- Move LA
- Nelson & Nygaard
- PolicyLink
- Public Health Institute
- Prevention Institute
- Public Advocates
- Public Health Departments in Shasta, Marin, San Mateo, & Los Angeles
- Public Health Law & Policy
- Public Law Center
- Public Policy Institute of California
- Raimi & Associates
- Reconnecting America
- Safe Routes to Schools
- TransForm

Starting with metrics proposed by many organizations and agencies, we developed a final list of 13 metrics. For each proposed metric, we also provide a review of its links to health and a description of how it can be measured.

## SB375 & Health

As California continues to grow over the coming years, we will need to accommodate **millions of new households and jobs**.

Currently, the **cars and trucks** we drive account for almost **40% of our greenhouse gas emissions**. How will **further growth** impact our **climate**?

Transportation and land use decisions impact our health by changing air quality, noise levels, physical activity rates, pedestrian and bicycle injury rates, and access to the goods and services we need to live healthy lives.

Children born today are expected to have a shorter life span than their parents due to obesity and respiratory illnesses. How will **further growth** impact our **health**?



# The Health and Equity Metrics

## SAFETY

1. Map annual number of pedestrian and bicycle collisions (and severity of injury/fatality): per capita, per geographic area, by daytime population.
2. Total number of vehicle, bike and pedestrian collisions per capita, broken down by injury type: fatalities and injuries.

## ACCESS TO GOODS, JOBS & SERVICES

3. Proportion of households that can walk or bike (10 minutes) to meet at least 50% of their daily needs. Public daily needs defined as: schools, parks, healthcare institutions and transit. Private daily needs defined as: restaurants, grocery stores, food markets and childcare.
4. Proportion of households and proportion of jobs within 1/4 mile of local public transit (including both bus and rail) or 1/2 mile of a regional public transit, that has less than 15 minute frequencies.
5. Proportion of daily trips less than 3 miles and less than 1 mile by mode (walking/biking/transit (bus and rail)/driving).

## GENERAL TRANSPORTATION

6. Daily amount (in minutes) of work-trip and non-work trip related physical activity.
7. Work and non-work trip mode share (including biking, walking, transit (bus and train), carpooling and SOV)- Both at peak times and all day.

## FUTURE GROWTH

8.
  - a) Share of housing growth in transit priority areas, targeting measures of how many large (3-4) bedroom units, senior housing, low-income units will be built;
  - b) Proportion of projected population growth located in transit priority areas;
  - c) Proportion of projected jobs in transit priority transit areas.

## ECONOMIC

9.
  - a) Percent of household income consumed by housing and transportation combined;
  - b) Percent of income going towards housing costs;
  - c) Percent of income going towards transportation costs.

## ENVIRONMENTAL POLLUTION

10. For all daily trips, per capita miles traveled by mode (walking, biking, transit, vehicle).
11. Working with a local public health department, university or air quality management district: Estimate pre-mature mortality attributed to traffic related ambient PM 2.5, and estimate asthma incidence and asthma exacerbations attributed to traffic related NO2.
12. Proposed housing near busy roadways will require:
  - a) Assessment by local air district or public health department of the need for environmental/health impact analysis when housing is proposed near (within 1,000 feet) busy roadways (over 100,000 Average Annual Daily Traffic (AADT) or other significant pollution sources (e.g., rail yards, port terminals, refineries, power plants, etc); and
  - b) Best practice mitigation requirements by local governments when the above assessment determines that environmental quality is below standard for such proposed housing, and if such housing is determined to be safe by local air districts and public health departments with identified mitigation.

For MPO representing highly urban regions, we suggest an alternate metric due to the ongoing concern about the lack of developable land, the need for housing, and equity concerns about placing low-income residents near polluting emissions of cars and trucks.

Alternate Metric 12: Working with a local public health department, university and/or air quality management district:

- a) Estimate the number of sensitive sites (homes, schools daycares, parks, etc.) within 1,000 feet of freeways and other major pollution sources, based on standards such as Bay Area Air Quality Management District's.
- b) Estimate proportion of affordable housing units vs. market rate units within above identified areas.

## EQUITY

13. Measure and stratify all indicators by race/ethnicity; income; geography (neighborhood, Census block or tract level, or Community of Concern); age; disability.

## Ways You Can Advocate for Health and Equity

Through letters to and meetings with MPO staff and Board, through testimony at public meetings, and in letters to local press, **you can advocate that health and equity be considered** when your MPO is:

- ✓ Developing performance metrics to assess proposed growth scenarios.
- ✓ Proposing scenarios about future transportation and land use.
- ✓ Conducting its Environmental Impact Review (EIR), which technically requires an analysis of health impacts, but often doesn't. You can do this when the agency announces that it is starting the EIR at the Notice of Preparation stage, when it is Scoping the EIR, and/or as comments on the Draft EIR.



Tuesday, Feb. 14, 2012

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

Dear Hasan:

On behalf of the American Lung Association in California and Human Impact Partners, we would like thank you and your staff for your leadership to improve the health and equity benefits of the Sustainable Community Strategy/Regional Transportation Plan. We appreciate the hard work and broad community and stakeholder outreach that you and your staff have undertaken and congratulate you on developing a plan that meets the 2020 and exceeds the 2050 greenhouse gas reduction targets as well as reduces air pollution and vehicles miles traveled.

A broad-based coalition of health, transportation, academic, environmental, environmental justice and housing advocates participated in the development of recommendations for health and equity performance measures that should be incorporated in the development of RTP/SCS plans. While we are pleased that SCAG has incorporated some of those metrics, there are many others that we continue to urge you to include in future SCS/RTPs.

To aid SCAG in measuring and monitoring these health and equity targets and determinants, we have attached the original Health and Equity Metrics for Sustainable Communities Strategies and a commentary table specifically addressing the performance measures that SCAG has included in the 2012 RTP/SCS.

We look forward to working with you to support a truly health protective, equitable and sustainable plan for Southern California, and urge you to consider these additional measures to best achieve this goal.

Signed,

A handwritten signature in black ink that reads "Bonnie Holmes-Gen".

Bonnie Holmes Gen  
Executive Director for Air Quality and Public Health  
American Lung Association in California

A handwritten signature in black ink that reads "Kim Gilhuly".

Kim Gilhuly  
Project Director  
Human Impact Partners

## Health and Equity commentary on SCAG 2012 RTP/SCS performance measures and Environmental Justice performance measures

**A broad-based coalition of health, transportation, academic, environmental, environmental justice and housing advocates spearheaded by Human Impact Partners participated in the development of recommendations for health and equity metrics that should be incorporated in the development of RTP/SCS plans. The chart below provides a commentary of how SCAG’s performance measures compare to the Health and Equity Metrics:**

SCAG RTP/SCS 2012 Performance Measure	Health and Equity commentary
Asthma incidence and exacerbation	We were glad to see this included but believe the data point could be strengthened by using NOx as an exposure measurement to better tie this outcome to vehicle emissions and monitor over time. SCAG is currently measuring exposure to NOx and has an accepted methodology to enable this analysis and quantification.
Analysis of percent of environmental justice households living within 500 feet from high-volume roadways.	We request analysis of the percent of environmental justice households and potential health outcomes within 1,000 feet to better reflect research demonstrating health impacts within that area, particularly in environmental justice communities. Protocols for addressing impacts are also needed. We also would request a measure of how many households are below market rate (BMR) vs. market rate (MR), as with the analysis in the EJ appendix.
Premature deaths due to PM 2.5	Thank you for including this performance measure.
SCAG 2012 RTP/SCS Environmental Justice Performance Measure	Health and Equity commentary
Jobs-housing imbalance	SCAG was responsive to stakeholders in measuring a jobs-housing imbalance, but the measurement could be improved by using methodology that UC-Davis and the Sacramento Council of Governments has developed. There is a relatively simple methodology to do a jobs-housing fit by creating a 4-to-5-mile buffer zone around major job centers, and comparing wages provided by those jobs to cost of housing within the buffer zone to see if there is a good fit. UC-Davis is developing this tool to be able to project the jobs-housing fit into the future, which would enable SCAG to show how the Plan will impact this performance measure.
Gentrification & displacement	We applaud this measure and request ongoing monitoring and development of mitigation measures. SCAG’s analysis indicates that with ongoing concentration of new housing in High Quality Transit Areas (HQTAs), gentrification and displacement will happen. While this can be discerned from the analysis of what has happened with the indicators historically, they do not project change with these indicators. It would strengthen this EJ analysis to see how many market-rate vs. below-market rate units are planned for each TAZ, and the EJ Toolbox could be strengthened by suggesting displacement

	mitigation measures.
Access to employment and services (45-minute auto access)	Kudos for measuring this, but we would like to see measurements for walking and biking access and recommend using a 30-minute walking or biking travel time. An alternative method would be to map ½ mile access to employment and services for walking and cycling. The cut-off choice of 45- minute auto access time does not show, from a health lens, how people could be more likely to use active transport methods to access jobs and services.
Access to parks	Similar comments to access to employment and services, above. It is not clear for either measure what “average” access is.
RTP project investment share	This analysis does not detail what kinds of investments are targeted for each quintile, i.e., will there be more rail investment in higher or lower income quintiles, for example. This analysis was a step in the right direction but more detail would help determine if the type of investment is targeted for the mode usage of each income level and/or ability/disability.
Air pollution and noise exposure	The analysis showed clearly that risks are higher for EJ populations, and that more current and future housing near freeways and busy roadways is targeted for lower-income residents and minorities. We were pleased to see that a mitigation measure in SCAG’s toolbox is to do a corridor-level analysis for proposed projects in areas where roadway air quality impacts are concentrated among EJ communities. We request more indicators that measure actual health outcomes. Respiratory risk was not well-defined. Also, mapping in smaller geographies would be useful as the maps were unable to show much at the regional level.  With regard to noise, we see that highway noise reductions will not benefit EJ communities as much as non-EJ communities. We appreciate the noise mitigations suggested in the Toolbox.
Share of household and employment growth in High Quality Transit Areas (HQTAs)	Would like to see household growth, job growth, and population growth. Would also like to see how many large (3-4 bdr) units, how much senior housing, and below market rate (BMR) units projected for HQTAs.

**SCAG stated that the following recommended metrics would be targeted for a future RTP/SCS if data became available. We would encourage SCAG to continue researching ways to measure and report out these indicators earlier than in the next RTP/SCS.**

SCAG 2012 RTP/SCS Performance Measure	Health and Equity commentary
Percent of households with walk access to neighborhood services	SCAG states further research is needed. SANDAG has pioneered mapping strategies for this, and SCAG has laid the groundwork for this analysis in the Environmental Justice appendix.
Percent of existing and new BMR rental housing units in TOD areas	SCAG states further research needed, yet has measured a similar indicator above as “Share of growth in High Quality Transit Areas”.
Percent of jobs within 15	SCAG states that this is pending available data, but it is unclear why

minute walk of transit	this is not included since they are measuring growth of jobs and households in high quality transit areas. Also we are interested in proportion of jobs and households within ¼ mile of <i>local public transit</i> (bus and rail) and within ½ mile of <i>regional public transit</i> .
Percent of population within ½ mile of high frequency transit stop	SCAG states that this is pending available data, but we note that SCAG has assigned this task to their GIS team, which is a great sign. It is unclear what data is needed beyond what SCAG has access to since they have measured the share of household and employment growth in high quality transit areas.
Percent of residents within ½ mile walk to parks and open space (pending available data) (new research measure)	SCAG states this is pending available data but did perform a distance to parks analysis in the EJ appendix, so it appears this data is available.
Percent of households living with >65 decibels of noise	SCAG states that further research is needed, but this data is collected for the EJ appendix and appears to be available.

**We encourage SCAG to incorporate these additional performance measures, which were not included.**

SCAG 2012 RTP/SCS Performance Measure	Health and Equity commentary
Daily amount (in minutes) of work and non-work trip related physical activity	Methodology exists to predict this as the MTC has done.
Chronic disease resulting from changes in physical activity due to transportation project expenditures	Methodology exists to predict this via the California Department of Public Health.
SCAG 2012 RTP/SCS Environmental Justice Performance Measure	Health and Equity commentary
Injuries and fatalities from motor vehicle collisions, including from trucks, for pedestrians, bicyclists, as well as motor vehicle operators	While this is measured for performance measures, there is no EJ analysis.
<i>Premature mortality</i> from PM2.5 emissions from mobile sources, for EJ communities	SCAG looks at air quality and some EJ respiratory health issues, but the health effects of changes in air quality due to transportation expenditures would be clearer if premature mortality were measured and reported specifically in environmental justice communities. SCAG measures particulate matter, and so could do the calculation to attribute premature mortality to mobile sources of PM2.5.
Physical activity gained from active transport for EJ communities.	SCAG considers accessibility to parks, employment and services, which all tie into why someone would walk/bike/take public transit to get to these services. We request that the health benefits from transportation decisions be made explicit by measuring them.



To: Annie Nam, SCAG  
From: Max Pike & Kirk Marckwald  
CC: Sarah Weldon  
Date: 9/2/2011  
Re: Draft Electrification Briefing Papers

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Attached are draft issue briefs covering four important aspects of a potential Southern California freight rail electrification:

1. Timeline to Construct for Freight Rail Electrification in Southern California Pgs. 1-2
2. Defining the Scope of an Electrified Freight Rail Project in Southern California Pgs. 3-8
3. Dual Mode Freight Locomotives Pgs. 9-14
4. Similarities between Existing Electrified Rail Systems and a Possible System in Southern California Pgs. 15-20

These issue briefs have been prepared by California Environmental Associates on behalf of Union Pacific Railroad, BNSF Railway, and the Association of American Railroads (the Railroads) to help evaluate the costs, challenges, and benefits of electrifying freight rail mainline operations in Southern California.

These are the first in a series of briefs covering possible emission reductions strategies aimed at achieving zero or near zero emissions from various components of the goods movement system in Southern California. They are not intended to promote or to discourage the electrification of freight rail operations. Rather, this analysis will help inform various stakeholders of the environmental, operational, and economic implications of such a system and provide a thorough compendium of the most complete information currently available for each of several issue areas.

These briefs serve as an initial draft for each topic covered. The Railroads encourage other stakeholders to review the analyses and suggest improvements and other data sources that should be considered and incorporated. As more and better information becomes available, the Railroads will periodically update information and findings.

Please contact Max at 415-421-4213 x26 or [max@ceaconsulting.com](mailto:max@ceaconsulting.com) if you have any questions or comments.

## **Timeline for Freight Rail Electrification in Southern California**

To accurately evaluate the merits of freight rail electrification in Southern California, it is essential to understand the time required to implement an electrified system. The 1992 Southern California Regional Rail Authority (SCRRA) report provided an estimated timeline for complete electrification (conceptual design, preliminary engineering, environmental review, final design, bidding process, construction, and final testing for the three rail lines that carry the majority of the freight rail traffic in Southern California).<sup>1</sup> The 1992 SCRRA estimated timeline for each of these rail lines is shown in Table 1.

**Table 1: 1992 SCRRA Estimate: Years to Complete Electrification of Three Rail Lines**

<b>Route</b>	<b>Conceptual Design</b>	<b>Preliminary Engineering/ Environmental Review</b>	<b>Final Design</b>	<b>Advertise, Bid &amp; Award</b>	<b>Construction</b>	<b>Functional Testing/ Start up</b>	<b>Total</b>
Barstow	0.5	1.75	1.5	0.25	5	0.5	9.5
Yermo	0.5	1.75	1.5	0.25	5	0.5	9.5
Yuma	0.5	2	2	0.25	8.25	0.5	13.5

The Railroads believe that the timelines from the SCRRA report may have been reasonable at the time the report was prepared, but are unrealistic and not achievable in the current regulatory and litigation climate, especially with regard to the period needed for environmental review. For instance, each Railroad is in the CEQA environmental review process in Southern California for the expansion or construction of additional intermodal facilities near the Ports. These environmental reviews are entering their seventh year, and may take up to two more years to complete. In contrast, the SCRRA estimated that the studies could be completed and certified in just two years. Given that a freight rail electrification project would have a much broader scope and larger impacts than these intermodal railyard construction projects, the estimated timeframe of 1.75 to 2 years for the preliminary engineering and environmental review process used in the original SCRRA report is far too short.

Table 2 adjusts the SCRRA timetable to reflect the Railroads' real world experience. This analysis assumes the three mainlines (see Figure 2 in the "Defining the Scope" brief) would be constructed concurrently to achieve maximum emissions reductions in the shortest possible period of time, at the lowest cost, and with the fewest disruptions to existing rail operations.

<sup>1</sup> Southern California Regional Rail Authority, *Southern California Accelerated Rail Electrification Program*, February 1992. Report Executive Summary, p ES-6, Exhibit ES-3.

**Table 2: Revised time line for Southern California Rail Electrification**

<b>Route</b>	<b>Project Definition, Conceptual Design, Railroad and Utility Agreements, Access Rights, Regulatory Approvals, Funding Plan &amp; Funding Commitments<sup>2</sup></b>	<b>Environmental Studies &amp; Documentation</b>	<b>Final Design, Bid &amp; Award</b>	<b>Construction Time &amp; Final Testing</b>	<b>Total</b>
Railroads' 2011 Projection for all 3 Rail Lines	3 <sup>3</sup>	7	2.25	8.75-9.75	21-22
SCRRA's 1992 Projection for Yuma (longest rail line studied)	0.5	2	2.25	8.75	13.5

Under the Railroads' updated timeline and with an assumed program start date of 2012, the earliest date that construction and final testing of all three rail lines to Barstow, Yermo, and Yuma could be completed is 2033<sup>4</sup> and the projected emissions reduction benefits would not be realized until that date.

<sup>2</sup> While such a timeframe is theoretically plausible, for each year that the funding plan is not completed the entire project would shift as well. Construction should not start until 100% of the funding is secured.

<sup>3</sup> If funding commitments are not achieved by the third year, the project will slip a corresponding number of years.

<sup>4</sup> This is in comparison to the SCRRA assumption for the final design, bid, and award, construction time, and final testing for the Yuma line which is estimated to take 11 years. Southern California Regional Rail Authority, *Southern California Accelerated Rail Electrification Program*, February 1992. Report Executive Summary, p ES-6, Exhibit ES-3.

## Defining the Scope of an Electrified Freight Rail Project in Southern California

Proponents of freight rail line electrification are assessing the potential of electrification in Southern California to reduce regional air emissions from the goods movement system. However, since North American Railroads operate a transcontinental system, with locomotives traversing the continent (see Figure 1), the merits of partial electrification of the system has several drawbacks.

**Figure 1: 60-Day Movement of One Class 1 Line-haul Locomotive in the U.S.**



Prepared by California Environmental Associates

A national electrification program would be the most logical and least disruptive way to electrify the Railroads’ high tonnage mainlines. A national program would avoid the fragmentation between diesel and electrified segments that is inherent in a regional system. However, given the enormous amount of capital required (likely hundreds of billions of dollars), the necessary coordination among all of the states and Class 1 Railroads, and the geographic scale of such a retrofit, the Railroads believe a national scheme to electrify freight rail operations is not feasible in the foreseeable future.

While a national electrification project may be too large in scope, some electrification proposals under consideration in Southern California appear to be too narrow in their approach. One proposal being considered by the Southern California Association of Governments (SCAG) has suggested that an electrification could be phased in sequentially over three rail segments: the first from the Ports of Los Angeles and Long Beach (“the Ports”) via the Alameda Corridor to the

City of Commerce, the second from the City of Commerce to Colton/San Bernardino, and the third from Colton/San Bernardino to Barstow, Indio, or other major railyards at the edge or outside of the South Coast Air Basin (SCAB) (see Figure 2).<sup>5</sup>

**Figure 2: SCAG's Sequential Electrification Proposal**



Source: Cambridge Systematics, Inc.

This concept to sequentially electrify line segments is flawed and unrealistic for the following reasons.

First, a sequential approach would create temporary, intermediate locomotive exchange points where diesel locomotives would be swapped for electric locomotives (and vice versa). When the next line segment was electrified, these locomotive exchange points would become obsolete and new locomotive exchange points would need to be constructed at the next railyard along the route. At each locomotive exchange point, the Railroads would have to: (1) repurpose work space in the yard, thereby reducing the existing rail operations to accommodate electrified operations, or (2) acquire new real estate and build new tracks to exchange locomotives before trains could travel into or out of the electrified system.

Additionally, sequential construction would be more expensive than a non-phased system approach. Significant disruptions to current rail operations, and the requirement of additional

<sup>5</sup> Southern California Association of Governments, *Rail Electrification Methodology Overview*, May 2011, p. 6. SCAG's initial proposal for freight rail electrification suggested electrifying operations from the Intermodal Container Transfer Facility (ICTF) through the Alameda Corridor. Their current proposal creates a second stage to electrify operations through West Colton and San Bernardino and the last phase would aim to electrify operations from the San Pedro Ports to Barstow, Indio, Chatsworth, and San Fernando.

land and/or reduced throughput at the intermediate railyards would increase capital costs and the time required to complete a fully electrified system in Southern California. Furthermore, as discussed in more detail below, delays and increased costs would probably cause diversion of time-sensitive freight from rail to truck.

### Activities at the Locomotive Exchange Points

At each locomotive exchange point, every eastbound and westbound train would have their locomotives exchanged, either electric units for diesel units or vice versa. Increasingly, trains to and from Southern California utilize “distributed power,” which locates locomotives throughout the train, i.e., all locomotives may not be located together at the front of the train. Changing out these distributed power locomotives would cause significant delays and make operations at the locomotive exchange points more complex than if locomotives were only located at the front of the train.

In addition, when the locomotives were exchanged, air brake tests and other safety tests would be required before the train could continue. Under the best case scenario, and with extra labor, the Railroads estimate the total time required would be over three and a half hours for a single train.<sup>6</sup> The complete locomotive exchange process is detailed in Table 1.

**Table 1: Breakdown of Locomotive Exchange Best Case Scenario**

Power change element	Time	Total Elapsed Time
Pull train into railyard	20 minutes	20 minutes
Remove the front locomotives, replace with alternative power locomotive (either diesel to electric, or vice versa)	30 minutes	50 minutes
Uncouple the train in front of the center locomotive(s), pull front of train forward, remove middle locomotive(s), replace with alternative power locomotive(s) (either diesel to electric, or vice versa)	1 hour	1 hour 50 minutes
Remove the rear locomotives, replace with alternative power locomotive (either diesel to electric, or vice versa)	30 minutes	2 hours 20 minutes
Reassemble the train, perform air brake test	1 hour	3 hours 20 minutes
Train departs from railyard	20 minutes	<b>3 hours 40 minutes</b>

In contrast, freight trains currently move into and out of the SCAB without stopping. Therefore, introducing the locomotive exchange points would result in a minimum delay of at least three

<sup>6</sup> Interview with Michael Iden, General Director Car & Locomotive Engineering, Union Pacific Railroad, July 2011.

and a half hours per train in the goods movement pipeline. For time sensitive products, such as perishable agricultural products or items carried for a package delivery company with a hard delivery date, this delay would be unacceptable, causing some customers to ship their freight by other, higher-emitting modes.

There are significant costs and operational issues associated with a three and a half hour delay at any locomotive exchange point, be that an intermediate point of a sequentially built system or at the terminus of the electrified system. These costs will be described more fully in a subsequent issue brief, but for certain types of freight moves and destinations such a delay would cause trains to be about 20-25% less time competitive than trucks. This means freight that is currently moved on trains will be drawn to trucks. Also, depending on how the costs of a potential electrified system were to be borne, the need to build or modify one of more locomotive exchange points might cause the Railroads to raise their rates to shippers, thereby adding further pressures for shippers to consider a modal shift or a port of entry shift. Finally, were the region to decide to sequentially develop the system, such an approach would triple the cost of creating locomotive exchange points and these significant additional costs would far outweigh the potential earlier air quality benefits that such a sequential system might achieve.

### **Requirements for Locomotive Exchange Points**

Each locomotive exchange point, whether a temporary intermediate point or a permanent point at the electrified system terminus, would require a major reworking of an existing railyard(s) or construction of whole new yards to handle the additional operations necessary to switch between electric and diesel power. To ensure that there is sufficient space to handle trains with both diesel and electric locomotives, and to support the associated breakdown and rebuilding of trains, the Railroads would need to: (1) acquire new land to substantially increase the size of the yard, (2) build a new railyard, or (3) reduce the throughput at an existing yard. Each locomotive exchange point would require eight tracks to exchange locomotives for four trains at a time. This type of expansion is not feasible at any of the facilities proposed by SCAG because there is no developable land adjacent to the existing yards and because disrupting current housing or industrial activities on adjacent lands could never be considered. The alternative—reduced throughput—would cause further detrimental downstream effects by requiring increased activity at other yards, thereby pressuring freight rail customers to switch to other, higher-emitting transportation modes and/or causing shippers to switch to other ports of entry.

In the sequential system, the Railroads would also need to relocate or add diesel and electric locomotive facilities to the intermediate exchange points to maintain both diesel and electric locomotives. If these facilities were not relocated to the locomotive exchange points, the diesel locomotives would be required to travel into the electrified zone for service on tracks with an already high level of traffic. These additional diesel trips would also create emissions in the electrified zone, offsetting a portion of the emission reductions gained by electrification. Alternatively, the Railroads could use electric locomotives to transport the diesel locomotives

through the electrified zone, avoiding some of the extra emissions, but resulting in higher costs given the need for additional electric locomotives and the loss of track time for more productive operations.

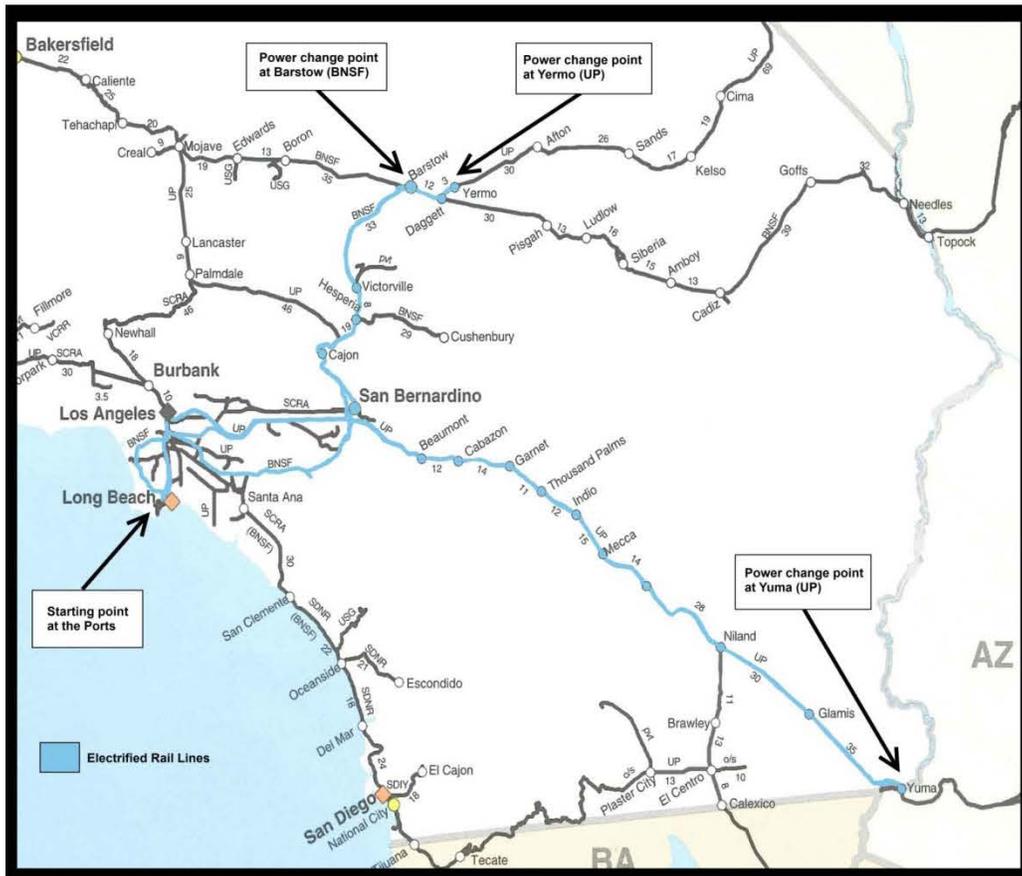
In summary, even though there could be modest air quality benefits that could be achieved earlier from a sequential development approach, such an approach creates a number of significant operational and economic hurdles, including the need for additional land, additional ready tracks, intermediate locomotive exchange facilities, and construction of new electric and additional diesel locomotive maintenance facilities. Furthermore, such a disruption to the goods movement system under such an approach could lead to the counterproductive shift of cargo from rail to less fuel efficient modes.

### **Conclusion**

The Railroads believe that short of achieving a national electrification system, the only regional system that should be studied and evaluated is one that would: (1) establish a logical and coherent framework for the region, (2) minimize construction disruptions to the current rail system to minimize loss of traffic to highway transportation or to other ports, (3) make full use of current rail facilities, and (4) assure that all routes of the system were funded and built simultaneously, not sequentially.

Such a study would be focused on the electrification of the mainlines from the Ports through the SCAB to the most logical terminals at Yermo, Yuma, and Barstow (see Figure 3). These lines carry a high percentage of the freight rail traffic in the SCAB. By evaluating a coherent and logical electrified system to these terminals, the project would avoid the costs of four intermediate power change points, would have far fewer operational challenges, lower costs, and would avoid the additional dilemma not having sufficient funds to complete the desired system.

Figure 3: Proper Study Area for Electrified Lines in Southern California<sup>7</sup>



<sup>7</sup> Base map from Professional Railroad Atlas of North America.

## Dual Mode Freight Locomotives

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### Introduction

Some proponents of electrification have suggested that an alternative to the traditional catenary system with dedicated electrified locomotives could be the use of “dual-mode” locomotives. Dual-mode locomotives could operate either on the electrified system (drawing power from the overhead catenary line) or function as independent diesel locomotives (deriving power from an onboard diesel engine), thereby eliminating the need to break down a train and swap electric locomotives for diesels or vice versa. However, such apparent flexibility from dual power locomotives evaporates when the capabilities and limitations of such units are carefully evaluated. For the reasons outlined below, the Railroads believe dual-mode locomotives could not and would not meet the freight rail operational requirements in Southern California.

The starting point for evaluating the suitability of a dual-mode freight locomotive must be based on the performance features of contemporary diesel freight locomotives used by the Class 1 U.S. freight railroads. Such a locomotive would need:

- Sufficient speed (70 mph) and sufficient pulling force, or tractive effort (185,000 pounds) from a single diesel engine
- Enough fuel capacity to travel approximately 1,600 miles without refueling
- Six traction motors (axles)
- Weigh less than 434,000 lbs
- Fit on a standard locomotive platform (less than 80 feet long)
- Include enough room for diesel aftertreatment equipment required to meet Tier 4 emission standards (see Figure 1)

Currently, there are no dual-mode locomotives proven to handle the power and other requirements for U.S. freight locomotives (i.e., reliability, life cycle costs, and federally-mandated safety directives).

There are two distinguishing performance characteristics of any locomotive: horsepower and pulling force.

1. Horsepower is required for speed.
2. Pulling force (technically known as “tractive effort” and measured in pounds) is required for moving heavy trains at low speeds over grades or hills.

Passenger locomotives are designed to meet only one performance characteristic: to move relatively lightweight passenger trains at high speeds (79-to-110 mph). While passenger locomotives may have high horsepower engines for speed, they do not necessitate engines that

can produce high levels of pulling force. Existing dual-mode commuter locomotives are capable of meeting the light-weight, high speed needs of passenger railroads, but they are not capable of meeting the needs of U.S. freight railroads.

### **Comparison of Passenger and Freight Locomotive Operating Requirements**

Requiring a freight railroad to use dual-mode commuter locomotives would be infeasible, uneconomical, and disruptive of time-sensitive freight train operations. The dual-mode commuter locomotives being considered for freight rail operations in Southern California are technologically inferior and inappropriate for the following reasons:

1. The 4-axle dual-mode design is grossly inadequate for western freight railroads which encounter heavy mountain grades (insufficient pulling force).
2. Dual-mode locomotives provide 1/12 the pulling force per dollar as compared to current Tier 2 line haul diesel locomotives. Therefore, to get equivalent pulling force, the Railroads would need to make 12 times the capital investment to run an electric line haul locomotive.
3. Excessively small fuel tanks, as a result of limited space on the locomotive platform, would reduce a dual-mode locomotives operating range between refuelings by approximately 75%.
4. Diesel engines in the dual-mode commuter locomotives are built for the passenger, not the more severe freight duty cycle and would therefore likely wear out much quicker, greatly increasing maintenance expenses for engine overhauls.
5. The dual-mode commuter locomotive, as currently designed, appears unlikely to be produced after 2014 because of its structural inability to accommodate the EPA exhaust aftertreatment required by Tier 4 regulation (see discussion and Figure 1 below).

The largest available dual-mode locomotive is the Bombardier ALP45DP, which generates 4,200 hp during diesel operations.<sup>8</sup> While this is roughly equivalent to the 4,400 hp rating of the modern freight locomotives operating in the U.S., other factors such as pulling force limit its use in freight operations. Table 1 below shows the characteristics needed by a locomotive for reliable and efficient freight rail service, and compares these specifications to those of the dual-mode Bombardier ALP45DP and the traditional Tier 2 diesel locomotives.

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<sup>8</sup> <http://www.bombardier.com/en/transportation/products-services/rail-vehicles/locomotives/other-projects/alp-45dp---canada--usa?docID=0901260d80165898#>

**Table 1: Comparison of Bombardier Dual Mode ALP45DP and Traditional Tier 2 Locomotives<sup>9</sup>**

Parameter	Traditional Diesel (Tier 2) <sup>10</sup>	Dual mode (ALP45DP) <sup>11</sup> (Tier 2)
Length (ft)	72-74	71.5
Width (ft)	10.9	10.9
Max Speed (mph)	70-75	130
Power Rating (hp)	4,400	4,200 (diesel) 5,367 (electric)
Weight (lbs)	416,000	288,000
Pulling Force or Tractive Effort (lbs)	185,000 (at start)	71,000 (at start)
Starting Capability on 2% Grade (such as Cajon, Beaumont, etc.)	~4,170	~1,600
Dynamic Braking (lbs)	117,000 (at 12 mph)	~34,000 (at 20 mph)
Fuel Tank Capacity (gal)	5,000	1,800
Fuel Range (miles)	1,600	~500
Operating Range	Transcontinental	Urban short-haul, multi-stop trips and return
Number of Traction Motors (axles)	6	4
Number of Diesel Engine(s)	1	2 high speed engines (max. 1,800 rpm)

<sup>9</sup> This table is a truncated version of a more extensive comparison between Tier 2 diesel freight locomotives and the ALP45DP. To request a copy of the complete table, please contact Max Pike at max@ceaconsulting.com.

<sup>10</sup> <http://www.gettransportation.com/rail/rail-products/locomotives/evolutionr-series-locomotive.html> & <http://www.emdiesels.com/emdweb/products/sd70ace.jsp> & additional information from interview with Michael Iden, General Director Car & Locomotive Engineering, Union Pacific Railroad, August 2011.

<sup>11</sup> <http://www.bombardier.com/en/transportation/products-services/rail-vehicles/locomotives/other-projects/alp-45dp---canada--usa?docID=0901260d80165898#> & <http://www.railwayage.com/in-this-issue/alp-45dp-two-locomotives-in-one-june-2011-3228.html> & <http://www.railwaygazette.com/nc/news/single-view/view/alp-45dp-electro-diesel-locomotive-debut.html>

**Comparison of Passenger and Freight Locomotive Chassis Design**

As shown in Table 1, while the ALP45DP may have a relatively high horsepower rating to achieve high speeds, it does not have sufficient pulling force or dynamic braking for use in freight service. The engineers who built the ALP45DP made a number of design compromises to fit all of the necessary equipment onto the 4-axle car body. Although the power rating of the dual-mode locomotive is comparable to that required for freight service, the ALP45DP achieves that power output using two lighter, smaller, high-speed, off-road diesel engines which are much less durable than the medium-speed engines used in freight locomotives. While light-weight diesel engine technology has proven successful in certain switch locomotive applications (e.g., using GenSets), line haul locomotives operate on a much more severe duty cycle, and the lighter weight, high-speed engines have proven to be unreliable.

Using smaller engines would be similar to replacing a passenger vehicle engine with multiple lawnmower engines: they might work for a short period of time, but the demand on the engine would be so great that any advantages of the smaller size would be more than offset by the need for constant maintenance or replacement. An article in *International Railway* concluded that, “a high-speed (1,800 rpm) diesel [engine] is much lighter yet just as powerful, but its components will have a much higher wear rate.”<sup>12</sup> Replacing the two lightweight engines in the dual-mode passenger locomotive with a single, more robust engine would create further challenges with respect to size constraints when attempting to configure a Tier-4 compliant, freight-duty dual-mode locomotive.

The second compromise may be in the step-down transformer used in the ALP45DP, which is much smaller and lighter than comparable transformers (of similar voltage and power rating) used in Amtrak electric locomotives. This dual-mode transformer operates at a higher cooling oil temperature in order to minimize the size and weight. It is unknown how these transformers would perform over time in long haul, heavy duty freight operations in terms of reliability and maintainability.

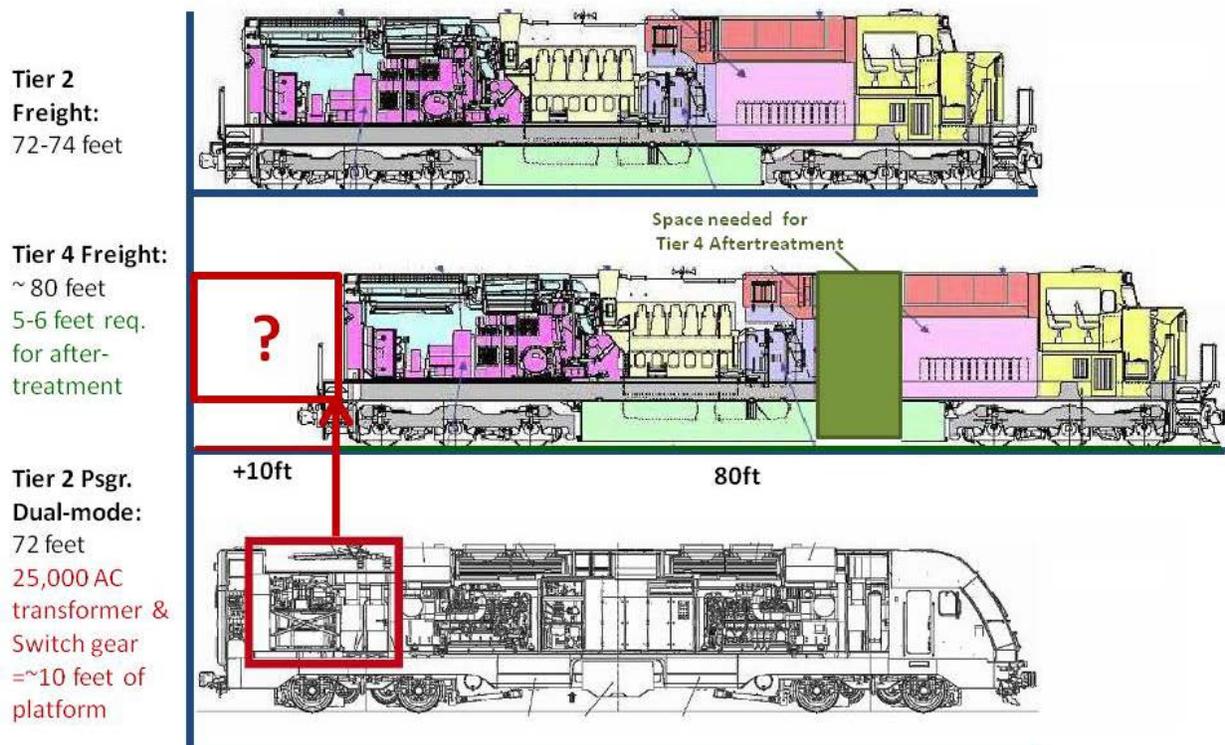
Lastly, it is not clear that a dual-mode locomotive could even be built within the current federally mandated freight locomotive “footprint” (length, weight, and height). In order to operate in freight service, the dual-mode locomotive would need to be reconfigured to accommodate six axles to provide adequate pulling force for transporting heavy freight loads. The dual-mode locomotive would also need a step down transformer and switch gear to operate on the overhead catenary system. Finally, to meet Tier 4 emission standards, it is expected that an additional five to six feet of length will be needed on a locomotive platform to accommodate the exhaust aftertreatment technology for the diesel engine. It is unclear how a manufacturer could also fit all of the required elements for a Tier 4 locomotive, along with the transformer and switch gear, within this same platform, while staying below the required size limits. Locomotive platforms cannot be extended beyond 80 feet, as day-to-day operations require that locomotives be able to turn within a fixed radius. Extending locomotives to 90 or

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<sup>12</sup> Vantuono, William. *American operator look to dual-mode traction*. July, 2006. *International Railway Journal*.

100 feet in length would preclude dual-mode locomotives from operating throughout the national railroad network, adversely affecting railroad operations by geographically constraining certain locomotives to certain track networks. The space constraints are graphically illustrated in Figure 1.

**Figure 1: Platform Issues with Dual-Mode Locomotives**



The space constraints discussed above also limit the size of the locomotive fuel tanks. A traditional diesel locomotive can carry approximately 5,000 gallons of fuel, allowing the locomotive to travel approximately 1,600 miles before refueling.<sup>13</sup> In comparison, the fuel tanks on most dual-mode locomotives have a capacity of around 1,800 gallons, greatly reducing the operating range of the units on the non-electrified track segments. In order for the dual-mode locomotives to be used throughout the national rail network, construction of additional fueling facilities would be required. Also, additional delays would be created due to additional refueling stops.

### Conclusion

Dual-mode locomotives are not a new technology. A small number of dual-mode locomotives have existed since the 1920s; however, they have only been designed for switch locomotive

<sup>13</sup> Interview with Michael Iden, General Director Car & Locomotive Engineering, Union Pacific Railroad, August, 2011.

operations or lighter passenger trains designed for higher speeds.<sup>14</sup> While newer, “high powered” (i.e., greater than 4,000 hp) dual-mode locomotives are available today,<sup>15</sup> these units have only been used for passenger service, which does not require the same level of locomotive durability as freight service. A manufacturer might eventually be able to build a freight dual-mode locomotive, but it would entail a lengthy design and engineering process.

The ALP45DP acquisition process took six years and is detailed below.<sup>16</sup>

2006	Specifications developed, reviewed, and approved
2007	Request for proposals advertised, and locomotive manufacturer selected
2008	Notice to proceed issued
2009	Design engineering
2010	Production design finalized and approved
2011	First locomotive prototype assembled, tested, and revenue service started
2012	Production completed

Locomotives in commuter rail service generally operate fewer than 18 hours per day over relatively short distances and over consistent and unvaried terrain. Unlike commuter trains, freight locomotives operate for extended periods over longer distances. For example, a freight train between Chicago and Los Angeles will travel approximately 2,200 miles over a two-to-three-day period. In addition, locomotives operating in freight service must have the power and durability to handle steep grades and extreme changes in ambient temperatures, such as the elevated temperatures found in desert environments and tunnels which can be longer than two miles. It is unlikely that the dual-mode locomotives available today could meet these demands.

In addition, the cost of existing dual-mode locomotives is \$12.2 million compared to \$2.4 million for a Tier 2 unit. To put that in perspective for the scale of freight operations in Southern California, 100 dual-mode units would cost the Railroads \$1.22 billion compared to \$24 million for the same number of Tier 2 units, if the dual-mode locomotives cost the same as the ALP45DP. However, it is likely that the additional requirements necessitated by freight rail operations in Southern California would drive the cost of each unit even higher. For all of these reasons, dual-mode locomotives are not a viable solution to address electrification of mainline freight operations in Southern California.

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<sup>14</sup> CBS Local, New York, *NJ Transit Unveils New Dual-Mode Locomotive*, May 11, 2011.

<http://newyork.cbslocal.com/2011/05/11/nj-transit-to-unveil-new-dual-mode-train/>

<sup>15</sup> .These newer dual-mode passenger locomotives are currently being delivered to and used in New Jersey and Montreal.

<sup>16</sup> <http://www.ble272.org/09-03-25%20Transproation-Safety%20Presentation.pdf>

## **Similarities between Existing Electrified Rail Systems and a Possible System in Southern California**

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Both in the United States and in other countries, there are a handful of electrified freight rail systems, either shortlines or as segments of larger networks. Proponents of electrifying freight rail operations in the South Coast Air Basin (SCAB) often point to these systems as proof that electrification of rail can easily be implemented in Southern California. However, any application of this technology must meet the specific demands of the geographic locale and operating characteristics of the rail system under consideration. Unless the operational and technical specifications are substantially similar, it is difficult, if not impossible to predict the success of a future system. Also, other factors, such as the political, economic, and environmental drivers must be evaluated for compatibility, as well.

### **Criteria for comparing electric rail systems**

The following design characteristics must be considered and matched before concluding that an existing electrification system provides an appropriate comparison to a proposed system:

- Service: passenger, freight, or both
- Materials transported: bulk or intermodal or both
- Common carrier or single industry service
- Terrain: mountains, hills, rivers, etc.
- Horsepower requirements
- Gross tons pulled
- Dedicated service or locomotive exchange points or connections to a larger rail network
- Sufficient existing or new infrastructure to meet energy and capacity demand
- Retrofitting an existing diesel line or construction of a new electrified system
- Source of project funding: private investors, taxpayers, or a combination
- Operating subsidies: initial or ongoing public operating subsidies

Several frequently cited electrified rail systems are described below. The QR National and the Trans-Siberian Railway (TSR) were retrofit to diesel systems. The Caltrain Commuter Rail Electrification proposal, were it to be built, would be a retrofit, as well.

The Black Mesa & Lake Powell Railroad (BMLP) and Deseret Power Railroad (DPR) are short industrial operation rail lines (i.e., not common carriers) that were built as rail line dedicated to serving electric utilities.

### **QR National**

QR National is the largest private freight hauler in Australia and is located in Queensland. Generally, QR National's operations are focused on large, heavy freight operations such as coal, iron ore, agricultural products, and containers. QR National operates the Central Queensland

Coal Network which consists of approximately 1,400 miles of freight rail infrastructure. Immediately following an oil crisis in the 1980s, QR National, under government operation at the time,<sup>17</sup> decided that projected oil prices justified the electrification of existing coal rail lines. QR National installed a 25 kV overhead catenary system on approximately 500 miles of their Blackwater network that began operation in 1986,<sup>18</sup> and on approximately 530 miles of the Goonyella system that began operations in 1985.<sup>19</sup>

Over time, however, the actual price trends in diesel fuel and electricity made the difference in operating costs between electric and diesel smaller than originally anticipated. QR National was unable to secure full cost recovery on the electric overhead infrastructure for the Blackwater rail line as of 2008.<sup>20</sup> Since it was electrified in the mid-1980s, the Blackwater system has been extended as more mines have become active in the region. However, further investment in electrification necessitated rate increases for QR National's other lines, with some lines witnessing a 28% increase.<sup>21</sup>

The justification for these increases has been debated and has prompted QR National's major customers to threaten to build their own rail lines. Recently, BHP Billiton, a major global mining company that accounts for 40% of QR National's business, has indicated that it plans to build its own rail line in response to the steep cost increases of QR National.<sup>22</sup> The high costs tied to the capital expenses and increased operational costs of running an electrified system demonstrate the potential impacts of electrification on the greater goods movement system.

### **The Trans-Siberian Railway**

The Trans-Siberian Railway (TSR) is a government funded and operated rail line in Russia that was built between 1891 and 1916. Stretching some 5,750 miles, it is the longest continuous mainline railway in the world. The TSR handles passenger and freight service—the principal

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<sup>17</sup> In July 2010 QR National was privatized and is now listed on the Australian Stock Exchange. QR National operates the Central Queensland Coal Network under a 99 year lease with the Australian government.

<http://www.qrnational.com.au/Corporate/Pages/AboutQRNational.aspx>

<sup>18</sup> The Blackwater rail network in Central Queensland consists of approximately 612 miles of total track; about 500 miles of the track are electrified. The Blackwater system connects 12 coal mines in the Bowen Basin coal area to two export terminals at the Port of Gladstone and also serves a number of domestic users including a power plant, cement plant, and refinery.

<http://www.qrnational.com.au/NetworkServices/RailNetwork/Pages/BlackwaterSystem.aspx>

<sup>19</sup> The Goonyella rail network is located in Central Queensland and consists of approximately 530 miles of track, all of which are electrified. The Goonyella systems connect 22 coal mines in the Bowen Basin coal region to the Hay Point Coal Terminal and Dalrymple Bay Coal Terminal. This network also transports products to other destinations by way of connections to the North Coast Line and the Central Line.

<http://www.qrnational.com.au/NetworkServices/RailNetwork/Pages/GoonyellaSystem.aspx>

<sup>20</sup> Synergies Economic Consulting. "Review of AT5; The Case for Network Wide Pricing." April 2008.

<sup>21</sup> Queensland Competition Authority. "QR Network's 2010 DAU - Tariffs and Schedule F." June 2010.

<sup>22</sup> <http://www.reuters.com/article/2011/08/18/bhp-rail-idUSL3E7JIOBI20110818>

commodities are coal, oil and oil products, and wood products.<sup>23</sup> The TSR was electrified over a 74-year period; electrification was completed in 2002. Both 25kv AC and 3kv DC overhead lines were installed at varying times and locations during the many decades-long construction period.

The electrification of the TSR rail system allowed average train weights to be doubled from 3,300 tons to 6,600 tons, producing reductions energy (and perhaps emissions) *per ton-mile* of freight hauled. Such a reduction, however, would not be realized were a freight line in the United States to be electrified, given the fact that the average western U.S. freight train currently is at least 9,900 tons.<sup>24</sup>

### **The Black Mesa & Lake Powell Railroad (BMLP) and the Deseret Power Railroad (DPR)**

The BMLP and the DPR railroads are privately owned utility rail lines used specifically to haul a single commodity—coal—to each utility’s power plant. Each is an industrial short line railway consisting of a short single-track with loops on both ends. They were built by the utilities as electric railway systems (BMLP began operations in 1973; DPR in 1984). The rail lines use a 50 kV overhead catenary system and each railroad operates one train at a time that makes two to three round trips per day. Neither the BMLP nor the DPR interchange with any other railroads and rail ways, and they are completely isolated from the national rail network. Both use multiple 6,000-horsepower electric locomotives to haul less than 10,000 tons of coal three times daily over a distance of 35 miles (DPR) to 78 miles (BMLP).<sup>25</sup>

An electrified industrial short line railway faces none of the challenges that common carrier railroads operating on a network system would. Since BMLP and DPR are single purpose industrial shortlines that have short and simple tracks, they are able to use high-powered electric locomotives to complete their primary objective: speedy, short, round-trip cycles. There is little variability in the weight pulled by BMLP and DPR from trip to trip; the trips follow a regular schedule; there is only one point of loading and one point of unloading; and thus, no locomotive exchange points are required.

In contrast, the freight rail *system* in Southern California is much more complex than either of these small-scale operations. First, the primary objective of the Railroads in Southern California is to maintain throughput, fluidity and reliability for their customers across the system, not just within Southern California. A partial electrification of the Railroads’ national system would interfere with all of these functions by creating locomotive exchange points where electric locomotives would need to be swapped out for diesel locomotives. Second, the Railroads’ systems are not a single track, with loops at each end, but are connected to national networks

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<sup>23</sup> Mote, Victor, “Trans-Siberian Railway.” *Encyclopedia of Russian History*. 2004. *Encyclopedia.com*. (August 19, 2011). <http://www.encyclopedia.com/doc/1G2-3404101396.html>

<sup>24</sup> Interview with Mike Iden of Union Pacific Railroad, July 2011.

<sup>25</sup> Black Mesa & Lake Powell Railroad is owned by the Salt River Project and the co-owners of the Navajo Generating Station; Deseret Power Railroad is owned by Deseret Generation & Transmission Company.

that span much of the United States.<sup>26</sup> Lastly, the variability in weight pulled from trip to trip is much greater for common carrier operations, as is the variability in times of travel.<sup>27</sup>

The technical attributes (a captive, single commodity, electrified loop rail operation) have no applicability to helping assess the feasibility of a complex freight rail operation in Southern California. The scale, scope, ownership, and purpose of each of these systems have virtually no overlap. .

### **Caltrain Commuter Electrification Project**

Some agencies have suggested that Caltrain's proposed Commuter Electrification Project to electrify a 52-mile passenger rail line between San Francisco and San Jose could be used to estimate the costs of and operational implications of the electrification of freight operations in Southern California.<sup>28</sup> However, as is the case with the other global examples described above, the Caltrain commuter electrification project does not provide a good basis for assessing the costs or operating challenges of a regional freight rail electrification project in Southern California. There are several fundamental differences between this project and an effort to electrify freight rail in Southern California.

In particular the Caltrain commuter electrification project would electrify the entire 52 mile Caltrain system. No locomotive exchange points would be required to interface with non-electrified portions of the system, and there would be no assembling and breaking down trains to deal with distributed power. Additionally, passenger rail lines have more consistent weight (and hence power requirements) per train, and consistent schedules, thus greatly simplifying the interaction between the rail electrification loads and the power grid.

Caltrain commuter rail has regular daytime operations with occasional freight trains during off-peak hours. This operating regime will allow construction to occur mostly at night and not interfere with the principal mission for the line. How disruptions in freight service during the 13 year construction period for a regional electrified freight system in Southern California would be significantly more complex than for Caltrain and has remained an unaddressed issue in any earlier analyses.

### **Funding for Electrification Projects**

In all of the examples discussed above, the electrification of the lines was either government financed or financed by a utility that could recoup its investments directly from its ratepayers. Given the enormous cost of electrifying Southern California freight rail lines, the vast majority

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<sup>26</sup> BNSF operates in 23 states and UP operates in 28 states.

<sup>27</sup> The times at which freight locomotives travel in an electrified system is important because of the interaction between the substantial electrical loads and the timing of electrical energy supplies, and other electrical loads, on the regional electric grid.

<sup>28</sup> Caltrain 2025 Electrification.

[http://www.caltrain.com/projectsplans/Projects/peninsularailprogram/Caltrain\\_2025\\_Electrification\\_.html](http://www.caltrain.com/projectsplans/Projects/peninsularailprogram/Caltrain_2025_Electrification_.html)

of the construction costs would have to be borne by government entities. Thus far, given the depleted nature of both state and federal treasuries, the likelihood over such a public commitment is speculative at best.

### **Planning & Evaluation Timeframe**

None of the railways discussed above were electrified under a set of governmental regulations similar to existing California requirements. The extended time required for assessment, review, and approval in California would increase both the cost and duration of the planning and construction processes.

### **Conclusion**

The Railroads believe the examples above demonstrate that existing electrified rail lines do not demonstrate the feasibility of other proposed electrification projects. Each rail application is unique and that many variables affect the technical and economic feasibility of a given rail electrification project. An evaluation of rail electrification in the SCAB must examine the true financial and other implications of an electrification project in Southern California. Proponents of such a system cannot assume that an electrified system operating under its specific circumstances in Russia or Australia is an indicator that electrification could succeed in Southern California.

As shown in Table 1 below, these existing electrified railways operate under very different conditions, and have different objectives, than the Southern California freight rail system. None of the examples discussed above match Southern California's unique technical, economic, political, and environmental climates, so their utility in making the case for an electrification project in the Southern California region is marginal, at best.

**Table 1: Comparison of Other Electrified Freight Railways to the Southern California Freight System**

Assessing Similarity to a Southern California Scenario						
Issue	Southern CA (645 miles)	TSR (5,753 miles)	QR National (>1,000 miles)	DPR (35 miles)	BMLP (78 miles)	CalTrain (52 miles) Proposed system
<b>Public subsidies: initial or ongoing public funding</b>	None proposed to date	Publically funded	Publically funded	Utility reimbursed by ratepayers	Utility reimbursed by ratepayers	Public funding
<b>Ownership: private or public when electrified?</b>	Private	Public	Public	Private Utility	Private Utility	Public
<b>Retrofitting an existing diesel line vs. construction of a new electric system</b>	Retrofit	Retrofit	Retrofit	New	New	Retrofit
<b>Locomotive exchange at connection to larger rail network</b>	Yes, multiple	Yes, multiple (change in voltage )	Yes	No	No	No
<b>Type of materials transported</b>	Intermodal goods Manifest and Bulk	Bulk and Manifest	Bulk and Manifest	Coal Only	Coal only	People only

Green shading = Similar characteristic to a Southern California system

Red shading = Significantly different from a Southern California system



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

February 14, 2012

**Re: Railroad comments on *Draft 2012 Regional Transportation Plan and Sustainable Communities Strategy***

Dear Mr. Ikhata:

On behalf of Union Pacific Railroad (UP), BNSF Railway (BNSF), and the Association of American Railroads (AAR), collectively “the Railroads”, we want to thank the Southern California Association of Governments (SCAG) for the opportunity to comment on the draft Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). The Railroads look forward to continuing to work with SCAG staff as it refines the 2012 RTP in the coming months. The Railroads comments are organized by the various documents in the 2012 RTP: the draft 2012 RTP, the Environmental Justice appendix, the Goods Movement appendix, the Project List appendix, and the Passenger Rail appendix. Each comment follows a quote from these documents (in *italics*). In some instances comments apply to multiple sections. Additionally, the Railroads have submitted a second comment letter on the draft PEIR.

These comments should not be construed as the Railroads’ agreement or a validation of the RTP, SCS, or other long term planning conclusions. The Railroads provide these comments in an effort to make SCAG’s analyses more reflective of actual railroad operational and business needs. However, because railroad operations often change due to circumstances beyond their control and/or to better serve their customers’ needs, it is critical that the Railroads preserve the flexibility to maintain fluid and responsive operations.

As an overall comment, many sections of the current draft RTP identify possible elements of the strategy without providing consistent information about: (1) who would fund each measure, (2) under what authority each measure would be undertaken, and (3) in what timeframe each measure would be implemented. The Railroads believe it is important to furnish that information so that all stakeholders get an accurate perspective of the overall plan (See Table 1 below). At a minimum, the RTP should note that these issues are unresolved.

**Table 1: Possible Program Elements Requiring More Specificity**

<b>Program Element (Page #)</b>	<b>Implementing agency identified?</b>	<b>Funding identified?</b>	<b>Timeframe identified?</b>	<b>Authority to implement identified?</b>
Further study/demonstration of electrification (Page 201 RTP)	No	No	No	No
Upgrading switcher locomotives (Page 74 RTP)	No	No	No	No
Phased implementation of a "near-zero or zero emission freight system" (Page 74 RTP)	No	No	Yes (see comments below)	No
Recommended mitigation for rail related impacts (Page 148 Environmental Justice appendix)	No	No	No	No
2012 RTP proposes electrification (Page 145 Environmental Justice appendix)	No	No	No	No
Upgrade switcher locomotives (Page 41 Goods Movement appendix)	No	No	No	No
Timeline to implement "Zero Emission Freight System" (Page 34 Goods Movement appendix)	No	No	Yes (see comments below)	No
Locomotive/rail: agency major implementation actions (Page 39 Goods Movement appendix)	No	No	No	No
\$3,771,002,000 for "Goods Movement Research and Development" (Page 422 Project List appendix)	No	No	No	N/A

**Comments on the draft 2012 RTP/SCS**

The draft 2012 RTP proposes a goods movement environmental strategy that includes, “a two-pronged approach for achieving an efficient freight system that reduces environmental impacts.”<sup>1</sup> These strategies include a number of “zero or near-zero”<sup>2</sup> emission rail technologies that require varying degrees of additional research and development. Thus far, SCAG has failed to clearly identify the multitude of issues associated with these potential technologies. The Railroads believe SCAG has not answered the Railroads’ questions submitted in September 2011 concerning basic operational requirements.<sup>3</sup>

Page 201 RTP (also on Page 21 of Passenger Rail appendix):

*Freight rail activity emits five percent of regional NOx, and four percent of regional PM goods movement emissions. Mitigation of rail emissions is currently underway with agreement to upgrade engine and reduce idling at certain rail yards, but more must be done to improve regional air quality, help meet federal requirements and reduce health impacts for communities near rail activity. There are several options for a zero emission rail system including electrification, battery-hybrid systems and fuel cells. Since 2008, SCAG has worked carefully with representatives from major rail lines, the AQMD and the ARB to carefully evaluate potential zero emissions options for freight rail. In particular, three forms of electrification were analyzed in great detail.*

- o *Electric catenary rail systems – These are perhaps the most technologically ready, however, construction for an electrified rail system in Southern California would be a major undertaking in terms of labor, timeline, and cost for the SCAG region, and would require large public investment as well as cooperation and investment by the BNSF and UP railways.*
- o *Dual mode locomotives – These are also under development and have the ability to operate both, on a catenary, or with traditional diesel power. The ability to operate in both modes could potentially reduce operational difficulties associated with electrification and would save time, reducing the need to remove the engine at the end of the electrified system.*
- o *Linear synchronous motors – This technology propels rail cars by creating an electromagnetic field from motors embedded in the railway. One advantage of LSM is that overhead electric lines would not be needed allowing the electric rail system to*

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<sup>1</sup> SCAG, draft 2012 RTP/SCS, page 74, December 2011.

<sup>2</sup> The railroads question the use of “zero or near-zero” terminology. The technologies discussed to date at best address tailpipe emissions and not total emissions. Electrification technologies merely export emissions to other areas.

<sup>3</sup> September 16, 2011 comment letter to SCAG on the Freight Rail Electrification Analysis; October 14, 2011 comment letter to SCAG on the *Environmental Mitigation Strategies Task 10.2 Report*

*extend further into ports and rail yards. LSM technology is in its early stages and costs cannot be estimated, however demonstration projects are underway.*

- o *The 2012 RTP specifies further study of these technologies to resolve operational challenges and to better quantify the costs of implementation and potential savings or cost increases of eliminating diesel fuel. In addition, several other technologies such as hybrid diesel-electric locomotives and battery electric tender cars will be considered. We also suggest and plan to participate in regional efforts to develop prototypes and demonstration of these technologies. Please see the goods movement appendix of the RTP and the SCAG Rail Electrification Study for more information about these technologies and next steps for development and deployment.*

**Rail Comment:** The RTP does not clearly state the issues that remain unresolved with these technologies. For example, SCAG needs to clarify if funds for such studies are already available. If not, the RTP should make clear that participation in further study and possible demonstration of these technologies will only be undertaken if funds become available for such activities in the future. SCAG should also clarify that these actions must be voluntarily undertaken by all stakeholders. Neither SCAG, nor other local, regional, and state agencies have the authority to require the Railroads to participate in or to provide funds for any study of electrification or any other technology. SCAG should also clarify that the “several options for a zero emission rail system” are not currently available, but could be pursued in the future if additional funding, research, development, and testing to confirm their applicability were completed. SCAG needs to clearly specify a timeframe for the continued study of these technologies. Lastly, the Railroads question why the recommendations on freight rail environmental mitigation are repeated in the passenger rail section of the RTP.

#### Catenary Electric

The Draft RTP identifies electric catenary lines, dual mode locomotives, and linear synchronous motors (LSM) as potential technologies for future study. Even though electric catenary systems are the most proven of the technologies identified by SCAG, there are unresolved, major operational concerns with a catenary system, in addition to the labor, cost, and timing issues noted in the draft RTP. Catenary electrification would fragment the national goods movement system and would require a major expansion of railyards at any intermediate, locomotive exchange points. At several such locations, no adjacent land is available for such an expansion. Exchanging locomotives would also result in significant, nation-wide delays in the goods movement system. (For more information on timing and operational issues with an electric catenary system, please see the two issue briefs, entitled *Timeline for Freight Rail Electrification in Southern California* and *Defining the Scope of an Electrified Freight Rail Project in Southern California*, which are attached.)

### Dual Mode Locomotives

As the Railroads have discussed at various technical working groups with SCAG, there are no existing dual mode locomotives for freight rail operations that could meet the U.S. EPA's Tier 4 emissions standards, and there may never be such locomotives due to operational size limitations. Thus the above statement in the draft document "*Dual mode locomotives – These are also under development...*" is misleading to readers.

Even if a dual mode locomotive could be built to meet the required size and emissions limitations, locomotive exchange points would have to be constructed throughout the SCAG region. In some instances there is insufficient land available and in all instances these exchange points would make the Los Angeles freight system less competitive, due to the additional delays and costs of equipment change outs.

Additionally, one diesel locomotive would still be needed at the locomotive exchange points for every dual mode locomotive in order to meet the needs of the national goods movement system. For additional information on dual mode locomotives, please see the attached issue brief, entitled *Dual Mode Freight Locomotives*.

### Linear Synchronous Motors (LSM)

Given the uncertainties about whether LSM technology can provide sufficient traction to safely move a 10,000 ton train up and down grades, and given the additional costs attributable to the extra lifts of containers necessitated by an LSM-enabled guideway, even some of the strongest proponents of the LSM technology do not believe this technology could ever be a systems-level propulsion technology for all or most rail-based container movements. This technology has never been proven in a rail application. Whether and how an LSM technology could pull a 10,000 ton train from sea level to an elevation of 3,800 feet on a 1.5-2.5 % grade, as well as provide adequate braking for such a train on a 2-3% grade moving in the other direction, are unanswered questions which present fundamental safety concerns. These are major questions still unanswered by both the potential LSM manufacturers (no systems are in operation today) and SCAG. As SCAG notes in Table 1.1 on page 13 of the Goods Movement Appendix, one of the goals of the RTP is to, "Ensure travel safety and reliability for all people and goods in the region,"<sup>4</sup> The Railroads believe that pursuing these technologies prematurely will have the opposite effect.

In a previous submission to SCAG<sup>5</sup>, the Railroads outlined other questions which remain unanswered:

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<sup>4</sup> SCAG, draft 2012 RTP/SCS, Goods Movement appendix, page 12, Table 1.1, December 2011.

<sup>5</sup> September 16, 2011 comment letter to SCAG on the Freight Rail Electrification Analysis

- Has SCAG obtained any engineering plans from General Atomics or another LSM proponent that describe the LSM cars with any level of specificity?
- Does SCAG assume that the Railroads' mainline tracks could handle LSM trains as well as conventional rail traffic, including Amtrak and Southern California Regional Rail Authority (Metrolink) passenger trains?
- Would railcars need to be retrofitted with LSM reactor plates? Rail cars have a diversity of ownership. How will the railcar retrofits be conducted and coordinated across owners? Does SCAG anticipate that all railcars, nationally, would be retrofitted with these plates? If not, how could rail carriers be assured that all railcars destined for Southern California are equipped with the requisite technology?
- How will the Right-of-Way be maintained (for undercutting, surfacing, alignment, etc.) if motors and/or magnets are attached to the ties or between the rails?
- How would the need for, the consequences of, and the costs of locomotive exchange points be addressed, if at all, with an LSM system? What are the embedded assumptions about the operational impacts of the time required to switch LSM helper-cars in or out of a transcontinental train?
- Have prospective LSM manufacturers suggested how they would install magnets or motors at switch points in between tracks (e.g. from a mainline to a spur)?

Page 74 RTP:

*For the near-term, the regional strategy supports the deployment of commercially-available, low-emission trucks and locomotives while centering on continued investment into improved system efficiencies. For example, upgrading switcher locomotive engines could reduce 1 to 3 percent of regional rail emissions.*

**Rail Comment:** As noted in Table 1, SCAG needs to clarify which stakeholder(s) would pursue this strategy and where funding would come from. SCAG needs to be clear that upgrading switcher locomotive engines is not in the resource-constrained plan and will only be pursued if stakeholders identify funds. Any participation by the Railroads to upgrade switcher engines would be voluntary. The Railroads believe that neither SCAG, nor any local or regional agencies, have the authority to require the Railroads to deploy newer switcher locomotives.

Furthermore, the Railroads have made significant environmental investments in the SCAG region over the last decade or more. The progress made over the years has been documented by the Air Resources Board (ARB) in numerous public meetings. For example, in 2005, the

Railroads signed a MOU with ARB that was estimated to reduce PM emissions by 20% by 2008 at rail yards statewide. In 2009, ARB determined that the Railroads had fully complied with all requirements of the 2005 MOU. In 2010, the 1998 Fleet Average Agreement was implemented. ARB has said that the 1998 Fleet Average provided “locomotive fleet benefits in southern California 20 years earlier than the rest of the country.”<sup>6</sup>

Page 74 RTP:

*In the longer term, the strategy focuses on a more fundamental shift in technology – taking critical steps toward gradual implementation of a zero-emission or near zero-emission freight system.*

**Rail Comment:** As the Railroads work with other stakeholders to further reduce rail emissions in the SCAG region, it is important that any technology introduced does not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system. It would be helpful to point out that to date, stakeholders have not reached consensus on technologies, timing, funding, or emissions impacts of the various options SCAG examined in the RTP. Prior to proposing a fundamental shift in implementing new technology, SCAG and all goods movement stakeholders need to clearly establish if and where within the existing rail system, such “*critical steps toward gradual implementation of a zero-emission or near zero-emission freight system*” could be implemented.

Page 75 RTP:

*As summarized in Table 2.11, the zero-emission East-West Freight Corridor would eliminate 4.7 tons of NO<sub>x</sub>, 0.16 tons of PM<sub>2.5</sub>, and 4,000 tons of CO<sub>2</sub> emissions daily. Full electrification of the rail system, though still a concept at this point, would remove comparable amounts of NO<sub>x</sub>, PM<sub>2.5</sub>, and CO<sub>2</sub>. \*Rail electrification is shown here for illustrative purposes only. Further research and development is required to determine if this is a reasonable option for implementation.*

**Rail Comment:** SCAG should clarify the methodology used to estimate emissions reductions from an electrified system. SCAG needs to explain how it accounted for the additional emissions produced as a result of the electricity required for such a system and if it has not accounted for them, SCAG should do so in the final version of the RTP. These emissions have real environmental impacts and should be addressed in any reference to

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<sup>6</sup> California Air Resources Board, *Statewide Strategies to Reduce Locomotive and Associated Rail Yard Emissions*, December 2006. [http://www.arb.ca.gov/msprog/offroad/loco/121406ryloco\\_strtgy.pdf](http://www.arb.ca.gov/msprog/offroad/loco/121406ryloco_strtgy.pdf)

electrification of a freight rail system or the associated emission reductions. Please refer to the attached issue briefs for more information on electrification.

Page 70 RTP:

*In past RTPs, SCAG has envisioned a system of truck-only lanes extending from the San Pedro Bay Ports to downtown Los Angeles along the I-710, connecting to an east-west segment, and finally reaching the I-15 in San Bernardino County... The East-West Freight Corridor would carry between 58,000 and 70,000 trucks per day – trucks that would be removed from adjacent general purpose lands and local arterial roads.*

**Rail Comment:** One of the alternatives of the East-West Freight Corridor for trucks is proposed to be directly adjacent to a UP mainline track. As UP has stated in discussions with SCAG staff, although off of UP privately-owned right-of-way, construction of such corridor could limit future opportunities for businesses to become rail served.

### **Comments on Environmental Justice Appendix**

The Railroads' comments on the Environmental Justice appendix are organized according to the following primary issues:

- Unequal characterization between rail and highway impacts
- Different methods of evaluating rail impacts and highway impacts
- Inconsistencies with the rest of the RTP

While the Railroads understand the need to assess the impacts of the RTP/SCS on communities across the region, SCAG's approach to this analysis with respect to rail is flawed and misleading in several respects. SCAG's treatment of rail-related impacts in the Environmental Justice appendix implies that rail operations are a very significant contributor to air quality impacts in the region.

While SCAG does not explicitly compare highway impacts to rail impacts, the tone and context with which SCAG presents rail-related impacts could leave the reader with the misimpression that rail impacts are equal to, or more severe than, the impacts from highways and other mobile sources. This theme is unfortunately repeated elsewhere in the Environmental Justice appendix, as exemplified in Table 2, below. Of the greatest concern is the drastic difference between the information presented in Exhibit 26, a map which shows modeled regional cancer risk, and Exhibit 34, a map which purports to show the health impacts related to rail lines, while only displaying regional cancer risk data and a map overlay of rail lines.

**Table 2: Comparison of evaluation of impacts of rail versus impacts of highway and arterials**

	<b>Buffer for demographic analysis</b>	<b>Compares baseline vs. plan scenarios?</b>	<b>Overlays cancer risk with source?</b>	<b>Identifies changes in pollutant exposure?</b>
<b>Highway Impacts Section</b>	* Areas within 500 feet of major corridors * Roads with daily trips >100,000; rural roads w/ daily trips >50,000	Yes	No - mapped region-wide only.	“Similar to the results of the regional emission analysis...the 2012 RTP/SCS will reduce both CO and PM for most places along the freeway adjacent areas...” Pg. 122
<b>Rail Impacts Section</b>	* Areas within various distance of any rail line or rail facility: * 1/4 mile; 1/2 mile; 1 mile; 2 miles (grade separations only)	No	Yes	No discussion

The Railroads would like to understand how SCAG intends to harmonize the Environmental Justice appendix with the draft RTP to resolve the inconsistencies between the two. Specifically:

- 1) Why does SCAG conduct the evaluation of environmental impacts from rail so differently than its evaluation of impacts from roadways?
  - a. Why do the buffer distances differ?
  - b. Why does SCAG evaluate baseline versus plan scenarios for the road and highway portions of the RTP, but not for rail?
  - c. Why does SCAG state that rail operations result in significant emissions while failing to quantify emissions from either rail or highways in the appendix?
  - d. Why does SCAG present a map of the regional cancer risk levels co-located with rail lines, without presenting the parallel display of cancer risk levels co-located with highways and arterials?
- 2) How will SCAG resolve the inconsistency between the recommended environmental mitigations in the RTP, Goods Movement appendix, Environmental Justice appendix, and PEIR?

- a. Will any of the recommended mitigation options in the Environmental Justice Appendix be placed in the Goods Movement appendix or main document of the RTP?
- b. Are any of the mitigation recommendations in the Environmental Justice appendix in the resource constrained plan or strategic plan of the RTP?
  - i. If so, how will they be paid for?
  - ii. If so, how does SCAG plan to implement them?

### **Unequal characterization between rail and highway impacts**

Page 136 Environmental Justice appendix:

*Exhibit 34 illustrates areas adjacent to railroads overlaid with areas of high cancer risk. As shown in the maps below, a large portion of areas adjacent to railroads [are] similar to areas of high cancer risk. These observations suggest that emissions from locomotives, rail yard and other rail facilities could result in an increased cancer risk in the neighboring low-income and minority communities. (See referenced Exhibit 34 further below)*

**Rail comment:** Both Exhibit 34 and SCAG's conclusion referencing it are fundamentally flawed; the conclusions presented are unfounded and SCAG does not provide supporting factual data.

First, SCAG does not clearly define how the cancer risk shown on the map was determined, what emissions or other environmental factors the map is intended to reflect, or what sources (e.g. mobile or stationary or other) the cancer risk derives from. They list as the source for the map, "SCAG, ESRI shaded relief, train atlas." This reference does not provide any information that would shed light on the critical assumptions that go into creating this analysis. ESRI is a GIS software developer, and therefore provides no information on the data inputs themselves. Additionally, the data presented in the environmental justice section is not consistent with, or supported by, any data in the PEIR's Health Risk Assessment, which only modeled certain representative highway segments and did not model rail.

Second, SCAG vaguely describes this map as an "overlay." If the data reflecting the areas of high cancer risk on the map in Exhibit 34 is the same data used to generate the regional cancer risk map in Exhibit 26, then the cancer risk was generated at the regional level, and is therefore not directly attributable to rail emissions. The map in Exhibit 34 illustrates the co-location of rail lines in areas where there are elevated cancer risks as a result of multiple sources of air pollution: it does not provide any data to show correlation or causation between rail lines, specifically, and cancer risk in the area. Additionally, the exhibit is misleadingly titled "Rail-related health risk impacts" when it presents regional data that is not based on rail emissions.

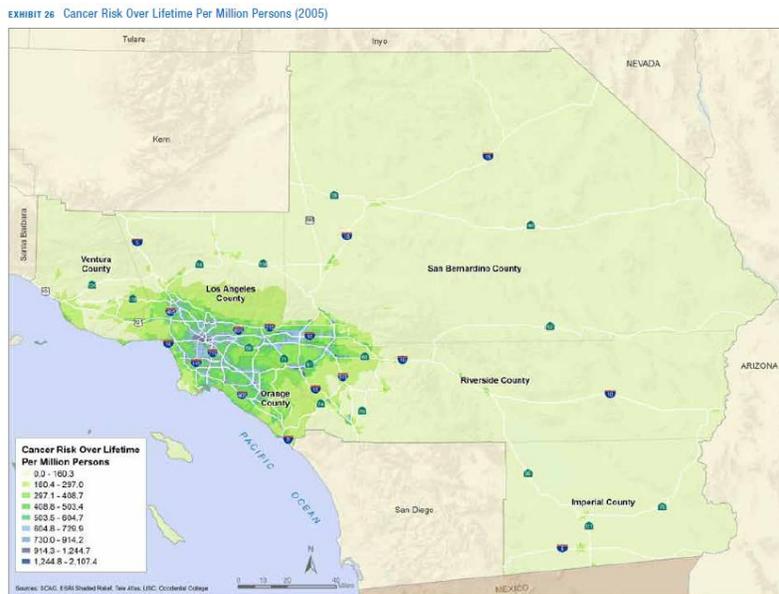
The major highways and arterials traversing the SCAG region cover the same areas where there are confluences of rail lines. The map presented in Exhibit 26 shows that the network of highways is co-located with the geographic area that is identified as having the highest cancer risk, but it does not emphasize the highways in the same manner that Exhibit 34 emphasizes rail lines. By overlaying the rail lines on the map in Exhibit 34 with a 1-mile buffer and then including the statement that “emissions from locomotives, rail yards and other rail facilities could result in an increased cancer risk in the neighboring low income and minority communities,” SCAG unfairly points to the potential impacts of rail, while failing to provide a comparable evaluation of the impacts from highways and arterials. All sources need to be treated with equal attention and assigned fair attribution.

For comparison, Exhibit 34 on page 137 and Exhibit 26 on page 104 of the Environmental Justice appendix are presented below. Both Exhibit 26 and Exhibit 34 appear to be derived from similar data for regional cancer risk, however they are displayed with very troubling differences. Whereas Exhibit 26 is presented in the more neutral colors of greens and blues, Exhibit 34 is in reds and purples, strengthening the intensity of the message about the negative health impacts of rail. Secondly, the two maps have different scales: Exhibit 26 is 40 miles-per-inch, and Exhibit 34 is 20 miles-per-inch. This makes the area of high cancer risk appear twice as large on the rail map as it does on the region-wide map. Finally, while the highway system appears on both maps, it is overpowered by the bright purple rail lines on Exhibit 34, making the highways barely noticeable. All of these factors leave the reader with the impression that rail causes more severe impacts than highways in the region, even though this conclusion is not supported by the data that SCAG presents. SCAG does not include a similar map highlighting the areas within 500-feet of a highway, to show corollary “highway related health risk impacts.” In fact, rail is the only source for which SCAG chose to do a map overlay of this type.

**Figure 1: Exhibit 34 from SCAG EJ Appendix**



**Figure 2: Exhibit 26 from SCAG EJ Appendix**



SCAG must either remove Exhibit 34 and misleading discussion language, or substantially revise it and provide the source data. If SCAG decides to keep Exhibit 34, it must present identical maps and analyses for arterials, highways, and other transportation sources discussed in the plan, such as airports. Further, SCAG should ensure that maps for each

source are presented in the same manner: at the same scale, with the same color scheme, and utilizing the same buffer distances.

While SCAG's maps demonstrate co-location of rail lines and highways or arterials with areas of regionally high cancer risk, it is crucial to point out that proximity does not equal risk. SCAG's presentation of a map which overlays the rail lines on top of a separately generated, regional cancer risk map to support observations about increased risk makes an inaccurate assumption that proximity to one source is equivalent to risk of exposure. Mere proximity to a source should not be used as a determinant for exposure in risk assessment analysis because it fails to identify the chemicals involved, the dose of exposure (including the dispersion of pollutants), the duration of the exposure, or the toxicity of the chemicals in question. SCAG should: (1) either remove the map entirely or (2) revise the maps as requested above and, in addition, revise the statements on page 136 of the Environmental Justice appendix as suggested below:

*Exhibit 34 illustrates areas adjacent to railroads overlaid with the modeled regional cancer risk from all sources ~~areas of high cancer risk~~. As shown in the maps below, a large portion of areas adjacent to railroads are co-located in ~~to~~ areas of existing high regional cancer risk. ~~These observations suggest that emissions from locomotives, rail yard and other rail facilities could result in an increased cancer risk in the neighboring low-income and minority communities.~~*

Furthermore, it should be noted that the Railroads, as well as other sources, have made significant improvements to their equipment and operations since 2005, the data year for the regional cancer risk map.<sup>7</sup>

### **Different methods in evaluating rail impacts and highway impacts**

**Rail comment:** SCAG rail impacts and highway impacts are handled differently by SCAG, both in discussion text and in how tables and figures are organized and displayed.

First, when analyzing the data on potentially impacted areas, SCAG uses shorter distances to create the geographic buffers around the highways and arterials than it does around the rail lines. Although the railroads do not endorse a particular buffer for demographic analysis, we believe the areas chosen by SCAG are unreasonably arbitrary. This arbitrary selection affects not only the evaluation of local impacts from rail, but also the assessment of whether

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<sup>7</sup> Six years of progress has been made and documented by the Air Resources Board (ARB) in numerous public meetings. For example, in 2005, the Railroads signed a MOU with ARB estimated to reduce PM emissions by 20% by 2008 at rail yards statewide. In 2009, ARB determined that the Railroads had fully complied with all requirements of the 2005 MOU. In 2010, the 1998 fleet average agreement was implemented and is estimated to reduce NOx by 67% from uncontrolled levels. ARB staff estimates that the railroads have reduced emissions at rail yards statewide by 50% since 2008.

the impacted communities are in fact environmental justice communities. We would like to see more information on how SCAG reached its conclusions that rail disproportionately impacts environmental justice communities versus non-environmental justice communities. SCAG does not show a rational basis for these conclusions.

The analysis buffer for highways is 500 feet, but the analysis buffer for rail lines is ¼ mile, ½ mile, and 1 mile. SCAG uses buffers to evaluate demographic trends or potential environmental justice areas (Table 47 on pages 134-35), and to generate the map for geographic overlay with regional cancer risk. SCAG does not provide any justification for the difference between the buffer distances around rail versus highways and arterials used in the analyses. ARB's Land Use Handbook cautions against locating sensitive land uses within 500 feet of a freeway, or 1000 feet of a rail yard (roughly .2 miles), and does not include recommendations for rail lines. SCAG should either justify the difference between the buffers or make them the same.

In the discussion of highway and arterial impacts, SCAG compares the impacts from on-road sources as a result of implementing the RTP to the impacts of a no-plan scenario. However, this comparison is not completed for rail impacts.

The approach SCAG staff took in characterizing the "Rail-Related Impacts" creates the potential for an inaccurate interpretation of rail's contribution to the region's air quality. For example, on page 136, SCAG states, "these observations suggest that emissions from locomotives, rail yard and other rail facilities could result in an increased cancer risk in the neighboring low-income and minority communities." However, in the section on highway and arterial impacts, SCAG does not discuss the potential for increased cancer risk from freeway emissions, but notes in the *regional section* that areas of high cancer risk are located near freeways (page 96). Additionally, in the introduction to the rail-related impacts section, SCAG states, "these observations suggest that rail-related environmental burdens, such as air pollution and noise from locomotives, rail yard and other rail facility, are relatively higher to low-income and minority communities than regional average" (page 131), but SCAG does not quantify the emissions generated by rail anywhere in the Environmental Justice appendix.

Further, although SCAG broadly states that rail emissions are significant on page 131 of the Environmental Justice Appendix, SCAG does not quantify actual emissions. Quantification of rail emissions and the comparison between the emissions from trucks on highways and rail emissions in the region is critical to understanding freight transportation tradeoffs, the context under which investments in rail are made, and the potential shifts between transportation modes. One train can carry enough cargo to take 280 trucks off the road, and rail is three or more times as efficient as trucks on a ton-per-mile basis. Therefore increased rail traffic can decrease overall emissions for communities in the region.

**Inconsistencies with the rest of the RTP**

The Environmental Justice appendix includes a set of environmental strategies for freight rail, called the “Recommended Mitigation for Rail Related Impacts,” that is completely different from that which is presented in the rest of the RTP. It is unclear who would implement these strategies, where the funds would come from, in what timeframe these mitigation measures would be pursued, and under what authority. SCAG does not state if any of these mitigation measures are a part of the resource-constrained plan or the strategic plan. Additionally, these strategies are not consistent with the strategies outlined in the RTP or the Goods Movement appendix.

**Table 3: Comparison of mitigation measures in EJ appendix as compared to the Draft RTP**

<b><i>Recommended Mitigation for Rail Related Impacts, Environmental Justice appendix (Page 148)</i></b>	<b><i>Goods Movement Environmental Strategy, RTP (Page 74)</i></b>
<ul style="list-style-type: none"> <li>• <i>Accelerated Introduction of Cleaner Line-Haul Units</i></li> <li>• <i>Construct sound reducing barriers between noise sources and noise-sensitive land uses</i></li> <li>• <i>Improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise</i></li> <li>• <i>Implement, to the extent feasible and practicable, speed limits and limits on hours of operation of rail and transit systems, where such limits may reduce noise impacts.</i></li> </ul>	<p>Near Term</p> <ul style="list-style-type: none"> <li>• <i>Upgrading switcher locomotive engines</i></li> <li>• <i>Continued investments into improved system efficiencies</i></li> </ul>
	<p>Long Term</p> <ul style="list-style-type: none"> <li>• <i>Critical steps toward phased implementation of a zero-emission or near zero-emission freight system</i></li> </ul>

**Rail Comment:** SCAG needs to clearly state whether the rail mitigation measures in the Environmental Justice appendix are a part of the resource-constrained plan or a part of the strategic plan. As stated earlier, SCAG also needs to clarify who would be responsible for pursuing these mitigation measures, where the funding would come from, in what timeframe the measures would be implemented, and under what authority. Neither SCAG nor other local, regional, or state agencies have the authority to require the Railroads to pursue any of these measures.

First, SCAG recommends the acceleration of cleaner line-haul locomotives. Tier 4 technology will not be commercially available until 2015, at the earliest. The development

of Tier 4 locomotives under the US EPA regulatory timeline is a significant challenge for locomotive and aftertreatment manufacturers. A revolutionary leap in both engine and aftertreatment technologies is required in order for line haul locomotives to meet Tier 4 emissions requirements. At this time, these new technologies are untested and unproven in line haul locomotive applications.

Historically, the development of new, effective locomotive technology has taken an average of about seven to eight years to achieve reliability goals (and some changes have taken more than a decade). However, the 2008 US EPA regulation (a technology-forcing regulation) allows locomotive manufacturers just six and a half years to conduct Tier 4 research and development, complete design and reliability field testing, and begin full-scale production. Since locomotive manufacturers are accomplishing a major technological change in an abbreviated timeframe, there are development risks associated with Tier 4 technology. These risks include the potential for in-use locomotive failures that would cause train delays and interruptions across the goods movement system. Therefore, the Railroads, while optimistic, are appropriately cautious at this time.

Second, the Environmental Justice appendix recommends the installation of sound barriers and acoustical insulation. The Railroads are not responsible for these improvements, nor can local jurisdictions require the Railroads to implement these measures. Again, SCAG needs to be clear about whether the RTP requires these measures to be implemented, or if they are only recommended actions for future consideration that do not currently have funding identified. SCAG also needs to clarify whether the installation of sound barriers would be on the Railroads' property and if there would be any potential for interruption to railroad operations.

Finally, in response to the recommended strategy to reduce speed or hours of operation, SCAG should note that the Railroads operate 24 hours a day, seven days a week. Limiting hours of operation would have nation-wide effects and could ultimately result in higher emissions in the SCAG region if containers were shifted to truck transport. Additionally, train speeds are dictated by track conditions and regulated by the Federal Railroad Administration<sup>8</sup> and therefore fall outside of the authority of SCAG. Accordingly, this strategy should be removed from the Environmental Justice appendix.

Page 145 Environmental Justice appendix:

*Additionally, the 2012 RTP proposes railroad electrification, which would significantly reduce rail-related emissions throughout the region, and especially for in low-income and*

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<sup>8</sup> FRA's Track Safety Standards establish track structure and track geometry requirements for nine separate classes of track. They can be found at **49 CFR Part 213, (Sec. 213.9 and Sec. 213.307)**. See also <http://www.fra.dot.gov/Pages/1234.shtml>

*minority communities adjacent to railroads. Further study and demonstrations are needed to broadly deploy near zero and zero emission rail technologies that would significantly reduce environmental impacts from locomotives and rail-related facilities. Please refer to the Goods Movement Technical Appendix to review the 2012 RTP Goods Movement Environmental Strategy and Action Plan for Technology Advancement.*

**Rail comment:** According to the Goods Movement appendix and the RTP, SCAG is not proposing to implement electrification, but rather to continue study of electrification and other ultra-low emission strategies in the future, if additional funds become available. Therefore, SCAG should remove the sentence that claims “the 2012 RTP proposes railroad electrification” and revise this section to be consistent with the Goods Movement appendix and the RTP. SCAG, and other local, regional and state agencies, do not have the authority to require the Railroads to pursue electrification. Additionally, please refer to the attached issue briefs for more information on electrification.

Page 131 Environmental Justice appendix:

*Environmental pollution from locomotives, rail yards and other rail facilities is a major public health concern at the national, regional and community level. The movement of goods by rail involves diesel-powered locomotives and equipment, resulting in significant emissions of particulate matter (PM), nitrogen oxides (NOx), hydrocarbons, and other air toxins throughout the process.*

**Rail comment:** SCAG does not specify what types of rail it is referring to in the impacts assessment. Is SCAG including freight and passenger rail? If passenger rail is included, are commuter lines and urban lines accounted for?

In 2010, ARB estimates locomotives contributed less than one percent of PM<sub>2.5</sub> emissions and less than three percent of NOx emissions in the South Coast Air Basin (see Figure 4 below). As a point of comparison, other mobile sources such as passenger vehicles, off-road equipment (e.g. farm and construction), and diesel trucks in the South Coast Air Basin contribute roughly 20%, 24%, and 27% of NOx, and 8%, 10%, and 7% of PM<sub>2.5</sub>, respectively.<sup>9</sup> Despite this, SCAG portrays rail emissions as regionally significant in the Environmental Justice appendix.

Finally, the Railroads disagree with SCAG's statement that locomotive emissions are a national “major public health concern.” The air quality and mix of emissions sources in the SCAG region are unique, and perhaps uniquely challenging due to the geographic and meteorological conditions. As SCAG notes, 33% of all freight containers in the U.S. move

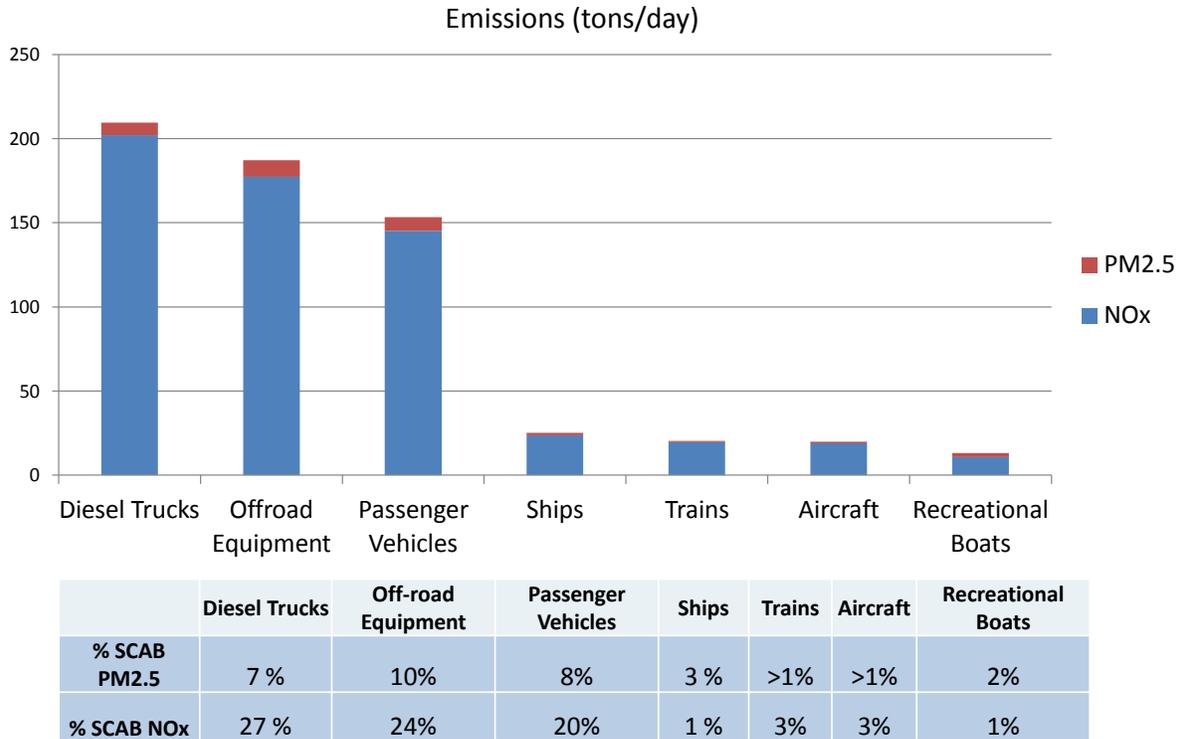
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<sup>9</sup> ARB - Almanac Emission Projection Data (Updated in 2009); Passenger Vehicles - LDV, LDT, LDT 2. Diesel Trucks - LHDV1, LHDV2, MHDV, HHDV

through the Southern California Ports.<sup>10</sup> Many of these goods travel on rail, and yet, rail is less than 3% of NOx and 1% of PM emissions in the South Coast Air Basin.

**Figure 3: South Coast Air Basin Mobile Source Emissions (2010)**

### South Coast Air Basin Mobile Source Emissions (2010)



Source: ARB - Almanac Emission Projection Data (Updated in 2009); Passenger Vehicles - LDV, LDT, LDT 2. Diesel Trucks - LHDV1, LHDV2, MHDV, HHDV

Figure 4: Drafted by California Environmental Associates. Source Data: ARB - Almanac Emission Projection Data (Updated in 2009); Passenger Vehicles - LDV, LDT, LDT 2. Diesel Trucks - LHDV1, LHDV2, MHDV, HHDV

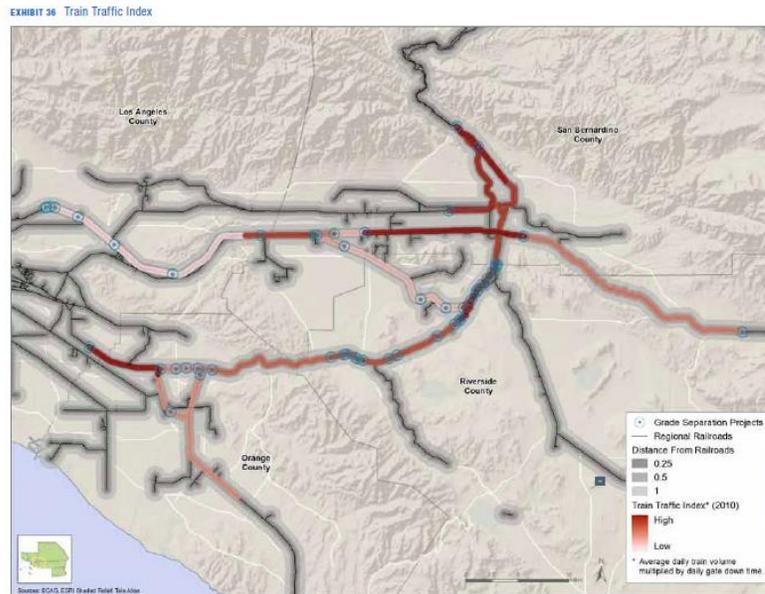
Page 145 Environmental Justice appendix:

*The train traffic index of each railroad segment is calculated by using average daily train volume multiplied by daily total gate down time of two grade crossings located at both ends of the segment. The following map illustrates the train traffic index of railroad segments adjacent to the grade separation projects... As shown in the map below, San Bernardino County and Riverside County have higher train traffic index values than other counties. As*

<sup>10</sup> SCAG, draft 2012 RTP/SCS, Goods Movement appendix, page 6, December 2011.

*railroad emissions and noise are greater where there is a large amount of train traffic volume, these observations suggest that the rail-related environmental impacts could be greater in San Bernardino County and Riverside County than other counties. And, based upon the analysis of Environmental Justice categories above, the low-income and minority communities adjacent to railroads and grade-crossings in San Bernardino County and Riverside County can be more affected by rail-related impacts, such as emissions, noise, accidents, traffic delay, etc. than other population groups.*

**Figure 4: Exhibit 36 Train Traffic Index**



**Rail comment:** SCAG uses the results of the train traffic index analysis to suggest the relative level of impact on different rail segments. Did SCAG include passenger trains in this index? SCAG should state whether the above map reflects both passenger rail and freight rail or just one or the other. SCAG's assertions about the correlation between "accidents" and "traffic delays" on such segments are purely speculative and should be noted as such.

Also, there should be a discussion of the planned improvements scheduled for these areas, through existing commitments for grade separations and capacity improvements, such as the Colton Crossing. In addition, SCAG fails to include a comparison of the improvements in train traffic index over the lifespan of the RTP. SCAG should clarify that the index provided is simply a snapshot in time for 2010. Given that Colton Crossing is a committed and funded project,<sup>11</sup> SCAG should show relative improvement gained through completion of Colton Crossing and other near-term grade separations.

<sup>11</sup> SCAG, draft 2012 RTP/SCS, Project List appendix, page 313, December 2011.

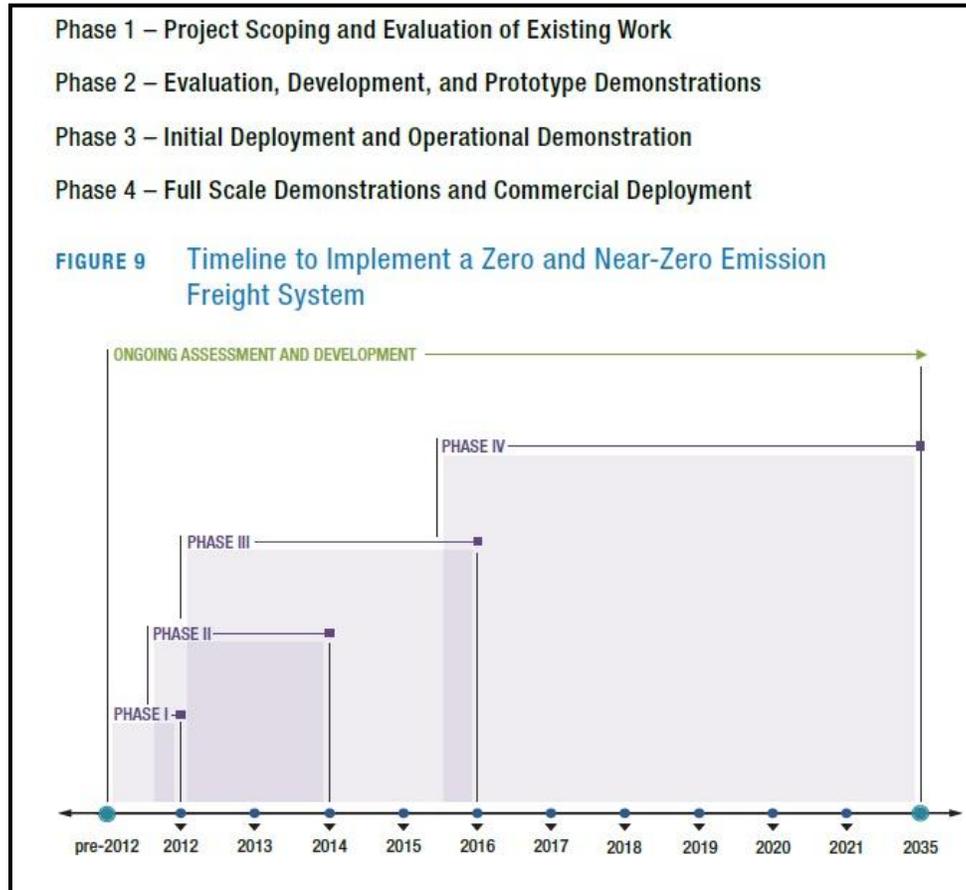
Furthermore, SCAG provides no information that the “total gate down time of two grade crossings located at both ends of the segments” has been correlated to traffic counts on the streets with the gates down. Without the traffic counts or the time of day data, SCAG can draw no conclusions about the correlation between gates being down and the impacts to human populations.

### **Comments on Goods Movement appendix**

As pointed out earlier in this letter, participation of the Railroads and other stakeholders in any of the strategies identified by SCAG in the Goods Movement appendix must be a collaborative and voluntary process. Despite the best efforts of the SCAG staff, many of these strategies are vague and potentially misleading. For example, SCAG provides a specific timeframe for the study and demonstration of various ultra-low emission technologies presented in a way that appears to be applicable for all of the technology options. In fact, the stage of development for each technology varies widely. Likewise, the timeline for the development and demonstration of each technology will vary greatly. One size does not fit all. The approach that SCAG has laid out in the Goods Movement appendix is of little utility to the stakeholders involved in the SCAG region and should be revised substantially or even removed.

Page 34 Goods Movement appendix:

**Figure 5: Timeline to Implement a Zero and Near-Zero Emission Freight System**



**Rail Comment:** SCAG needs to be clear about which specific activities associated with the phases of development listed in Figure 9 are in the resource-constrained plan, which have funds currently available, and which activities do not have funds available. This will help clarify which activities will only be implemented when, and if, additional funds become available. If there is funding currently available, SCAG needs to state that it plans to carry out the timeline presented for the technology demonstration and potential implementation of new freight movement technologies. If not, it should point out that such a project could not be implemented until or unless funding becomes available. Additionally, it is worth noting that any full scale demonstration and/or commercial deployment would need the full support of the Railroads, and potentially other governmental agencies, to move forward. SCAG should also include a provision that the Railroads will be involved in the design of the parameters for a full-scale demonstration.

In Figure 9, it appears that Phase 1 is already complete and consisted of the work done to develop the draft 2012 RTP. If this is true, SCAG should clarify that point.

The timeframe for Phase 2 will vary substantially depending on which technology is studied further. Electric catenary systems present some serious operational, safety, and funding issues; however, these systems are better understood and appear to be more developed than the linear synchronous motor system or the hybrid locomotive with an advance battery/tender car technology. SCAG should specify the technologies that would be evaluated in Phase 2 and provide specific timeframes for each. In any event, the timeframe identified by SCAG for Phase 2 is far too short for the evaluation, development, completion of the environmental review process and demonstration of an electrified system. For example, even demonstration of a catenary electric system would require the development of electric locomotives and the adaptation of those locomotives to western freight operations. Because most other ultra-low emission systems are only conceptual at this point, the timeframe for Phase 2 would be even longer.

The desired accomplishments in Phase 3 are unrealistic for the short time allocated. The timeline should be revised so that any deployment or operational demonstration would come after sufficient time has been allocated to resolve all technical, operational, and safety issues identified for the various low emission system options. As SCAG notes on page 35 of the Goods Movement appendix, past studies by the Ports of Los Angeles and Long Beach, *"highlight the difficult challenges associated with this sector, especially with regard to operational needs, integration of the technologies into the national rail system, federal safety requirements, and costs."*<sup>12</sup>

Additionally, the timeline for Phase 4 is unrealistic and should be lengthened to give adequate time for zero-emission technologies to mature and undergo sufficient testing. An inadequate or insufficient demonstration program or premature adoption could lead to serious disruptions to the national goods movement system. Please refer to the attached issue brief, entitled *Timeline for Freight Rail Electrification in Southern California* and the *Roadmap for Moving Forward with Zero Emission Technologies at the Ports of Long Beach and Los Angeles*<sup>13</sup> for more information on the timeline to implement an electrified freight rail system in Southern California.

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<sup>12</sup> SCAG, draft 2012 RTP/SCS, Goods Movement appendix, page 35, December 2011.

<sup>13</sup> Port of Long Beach & Port of Los Angeles, "Roadmap for Moving Forward with Zero Emission Technologies at the Ports of Long Beach and Los Angeles" Technical Report, Updated August 2011.  
[http://longbeach.granicus.com/MediaPlayer.php?view\\_id=18&clip\\_id=4942](http://longbeach.granicus.com/MediaPlayer.php?view_id=18&clip_id=4942)

Page 36 Goods Movement appendix:

*Phase 2 also includes initial proof of concept and testing of several types of zero-emission locomotive technologies and supporting infrastructure. Demonstration would include technology optimization along prescribed routes under conditions applicable to goods movement activities. An initial step would entail creating a test track to allow for the demonstration of various technologies to move containers. For rail prototypes basic performance requirements include, but are not limited to: sufficient tractive power to haul a double-stacked railcar, adequate braking capability and other parameters to support safe operation, and the ability to operate in zero-emission mode.*

*For rail, uncertainties associated with new technologies would be addressed through a rail operational assessment study that evaluates the potential operational impacts of a zero or near zero-emission rail system both within the Basin and on the larger national freight railroad system. This study would build on the work of SCAG's Rail Electrification Study, 2011. Because overhead catenary systems have already been proven for passenger and some freight applications, this study would also evaluate the practicability of utilizing existing technologies for rail service in the South Coast Air Basin.*

**Rail Comment:** SCAG should clarify under what circumstance this phase will be undertaken. The draft RTP implies that it would only take place if future funds are collected from the VMT tax, but it is unclear. If Phase 2 is undertaken, the Railroads believe that SCAG needs to explicitly outline on what right-of-way and for what purposes such a system could be deployed. Additionally, part of Phase 2 should include an evaluation to estimate the total capital and operating costs for such a system, how those costs might be passed through to customers, and if the magnitude of the costs might cause cargo to shift either between modes or to a different port.

Page 39 Goods Movement appendix:

**Figure 6: Locomotive/Rail: Agency Major Implementation Actions**

TABLE 16 Locomotive/Rail: Agency Major Implementation Actions

Year(s)	Agency	Agency Action
2012	SCAG	<ul style="list-style-type: none"> <li>▪ Incorporate “footprint” and planning for wayside power into expansion of rail lines in financially constrained 2012 RTP</li> <li>▪ Incorporate funding to support rail evaluation and demonstration efforts into financially constrained 2012 RTP</li> <li>▪ Implement plan of advocacy to secure action by federal or other governments where required to implement any related elements of the SIP or RTP; include evaluation of impacts of zero-emission technologies on national priorities, (e.g. energy security, energy cost certainty, interstate transportation, climate protection)</li> </ul>
2012–2014	SCAG, with AQMD/ARB on SIP	<ul style="list-style-type: none"> <li>▪ Evaluate and determine practicability of applying existing electrified rail technologies to region (by 2013)</li> <li>▪ Evaluate potential funding and implementation mechanisms for zero and near zero emission locomotives, and wayside power, including:                             <ul style="list-style-type: none"> <li>▪ Private (railroads); federal, state, local government; public-private partnerships; electric utility</li> </ul> </li> </ul>
2015–2016	SCAG, with AQMD/ARB on SIP	<ul style="list-style-type: none"> <li>▪ If existing electrified rail technologies are determined practicable for the region, identify technologies, infrastructure, and implementation mechanisms in RTP amendment and next major SIP</li> </ul>
2018–2020	SCAG, with AQMD/ARB on SIP	<ul style="list-style-type: none"> <li>▪ If existing electrified rail technologies were determined to not be practicable for the region, resolve need for wayside power for new rail technologies; decision would be based upon whether new technologies can achieve sufficient zero-emission range without wayside power</li> <li>▪ If wayside power is needed, incorporate “footprint” and planning for wayside power into rail lines into 2020 RTP and next major SIP</li> <li>▪ Incorporate recommendations regarding type of funding and implementation mechanisms into constrained RTP and next major SIP, including:                             <ul style="list-style-type: none"> <li>▪ Strategy description and timeframe for any rules</li> <li>▪ Strategy description, potential funding sources and timeframe for any incentives.</li> </ul> </li> </ul>

**Rail Comment:** It would appear from the simple language in Table 16 that the actions listed are included in the resource constrained portion of the RTP. However, SCAG has yet to identify what funding source would be used, and in what timeframe the ‘agency action’ would occur. Specifically, SCAG should clarify whether there is funding available for the incorporation of a ‘footprint’ and planning for wayside power into rail lines and/or whether there is funding identified to support rail evaluation and demonstration efforts. If there is not money available for such efforts, the Railroads believe that these measures would more appropriately be placed in the strategic plan. In any case, the timeframe for implementing these actions (2012) is unrealistic given the lack of funding identified to date.

It is not clear how SCAG, AQMD and/or ARB will determine if electrified rail technologies are feasible. The Railroads should participate in the development of design criteria to make this determination. SCAG also needs to clarify what is meant by ‘incorporate’ in the 2012 Agency Action section. Specifically, the Railroads have the following questions:

- What processes would occur should any of these elements be ‘incorporated’ into the RTP?
- Would this incorporation involve a formal amendment process?
- Would the Railroads have an opportunity to comment if SCAG, AQMD, and/or ARB were to pursue any of these implementation actions, based on the RTP?

Page 42 Goods Movement appendix:

*Because of the cost and potential operational challenges associated with mainline electrification, such a strategy should be considered a longer term initiative, requiring further studies as well as proof of concept and prototype testing of zero-emission locomotive technologies which have the potential to minimize cost and operational impacts, as discussed under the phased implementation section of this appendix... ..Construction of any electrified rail system in Southern California would require a large investment, as well as cooperation by the BNSF and UP railways.*

**Rail Comment:** SCAG staff has explicitly stated at various public meetings that mainline electrification is not part of the resource constrained plan or the strategic plan. Please confirm that this is the case. Additionally, SCAG should explain what is meant in the above paragraph by the statement that SCAG would require the “cooperation by the BNSF and UP railways.”

Page 42 Goods Movement appendix:

*Two promising technologies that are under development include hybrid diesel-electric locomotives and battery electric tender cars. Each requires additional development and a more thorough understanding of operational considerations. Fuel savings would allow for a small fuel storage tank and provide space for storage of the necessary batteries on individual locomotives. The locomotives would therefore switch between Tier-4 diesel electric and battery modes. The batteries would recharge as the locomotive is operating in diesel-electric mode. Also, battery electric tender car technology could be used with current locomotives. Battery tender cars would be placed behind diesel-electric locomotives, and would carry batteries that could power locomotives through the environmentally sensitive areas. Such a system could have many of the same advantages as the hybrid diesel-electric locomotives, including zero-emission operation, but would also have the added benefit of being applicable with current locomotives and reducing or eliminating the need for wayside power such as from overhead catenary wires.*

**Rail Comment:** SCAG should explain that neither the hybrid diesel-electric locomotive nor the battery electric tender car technologies are currently available and are not part of the resource constrained or strategic plan. Each technology would need to be designed, developed, and tested prior to implementation, which is a process that historically has taken between five to ten years.

Page 27 of the RTP (referring to the Goods Movement appendix):

*The RTP goods movement strategy ensures that investments in transportation infrastructure and associated transportation programs contribute to achievement of the region's air quality goals. Efforts are already underway, as the San Pedro Bay Ports have invested heavily in deploying clean trucks over the last several years. Additionally, planning efforts are underway to establish a regional zero emission freight system.*

**Rail Comment:** SCAG needs to clarify what is meant by the “planning efforts” for a “regional zero emission freight system.” These planning efforts will be, as the Railroads understand, the continued study and evaluation of technology, operational issues, and costs associated with various electricity-based options. While these technologies will likely offer some localized emissions reductions, as cleaner diesel locomotives are introduced into the region, including Tier 4 locomotives, the magnitude of emission reductions will be significantly reduced. SCAG identifies a similar trend in the potential for emissions reductions from passenger transportation strategies on page 28 of the RTP, stating that as, “*passenger vehicles have become cleaner, the positive air quality impacts of transportation strategies that reduce vehicle use or change congestion conditions (i.e., non-fuel or engine-based strategies) have been significantly diminished.*”<sup>14</sup> SCAG should also note that the magnitude of the benefits associated with electrification activity would be diminished with the introduction of cleaner locomotives.

Page 41 Goods Movement appendix:

*Switcher locomotives contribute only a small share of total locomotive emissions; however, their activity is concentrated in rail yards and greatly impacts surrounding communities. Nevertheless, low-emission technologies are available and have relatively low costs. To reduce emissions from switcher locomotives, one option is to replace remaining Tier 0+ switchers with new Tier 4 switchers. Although there are only projected to be 29 Tier 0+ switchers in the Basin in 2023, they have high emission rates. NOx and PM<sub>2.5</sub> emission rates from a Tier 4 switcher would be approximately 10–15 times lower than a Tier 0+ engines. Another option is to rebuild existing GenSet switchers with engines that meet the U.S. EPA Tier 4 non-road emission standards, which could cut Nox and PM<sub>2.5</sub> emissions by a factor of 10. The emission reductions of these strategies could reduce emissions for switcher engines between 27 and 53 percent. However, since switchers are a small part of the overall fleet, these two switcher strategies would reduce total freight locomotive Nox and PM<sub>2.5</sub> emissions by 1–3 percent.*

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<sup>14</sup> SCAG, draft 2012 RTP/SCS, page 28, December 2011.

**Rail Comment:** The RTP should note that SCAG, and all other local, regional, and state agencies, do not have the authority to require the retrofit or replacement of Tier 0 or Tier 0+ locomotives. SCAG should clarify that this strategy can only be implemented on a voluntary basis, is not in the resource-constrained portion of the RTP, and will only be implemented if stakeholders can fund the replacement of older switcher locomotives.

Tier 4 locomotives are not in production yet, and are not expected to become commercially available until 2015. Therefore, it is illogical to include a strategy to repower switcher locomotives with Tier 4 engines as they do not currently exist. Moreover, this is not a cost effective strategy to reduce emissions as switcher engines burn far less fuel than line-haul units. The Railroads have used public/private partnerships in the past to help reduce emissions from switcher locomotives as opportunities arise, but future projections out to 2023 regarding the repower of switcher engines to Tier 4 are not realistic.

**Figure 7: Emission Reductions from Replacing Tier 0 with Tier 4 Switchers (Tons per Day)**

**TABLE 17** Emission Reductions from Replacing Tier 0 with Tier 4 Switchers (Tons per Day)

Year	NO <sub>x</sub>			PM <sub>2.5</sub>			CO <sub>2</sub>		
	Switcher baseline	With Strategy	% Change	Switcher baseline	With Strategy	% Change	Switcher baseline	With Strategy	% Change
2010	1.37	1.37	0%	0.041	0.041	0%	94	94	0%
2023	0.68	0.35	-49%	0.017	0.001	-45%	123	123	0%
2035	0.37	0.37	0%	0.010	0.010	0%	153	153	0%

Source: SCAG Comprehensive Regional Goods Movement Plan and Implementation Strategy

**TABLE 18** Emission Reductions from Repowering Gensets with Tier 4 Non-Road Engines (Tons per Day)

Year	NO <sub>x</sub>			PM <sub>2.5</sub>			CO <sub>2</sub>		
	Switcher baseline	With Strategy	% Change	Switcher baseline	With Strategy	% Change	Switcher baseline	With Strategy	% Change
2010	1.37	1.37	0%	0.041	0.041	0%	94	94	0%
2023	0.68	0.50	-27%	0.017	0.011	-36%	123	123	0%
2035	0.37	0.18	-50%	0.010	0.004	-62%	153	153	0%

Source: SCAG Comprehensive Regional Goods Movement Plan and Implementation Strategy

Page 35 Goods Movement appendix:

*Additionally, significant effort has gone into analyzing the options for a zero-emission rail system in the Basin. These include recent efforts by the Ports of Los Angeles and Long Beach in their Roadmap study and by SCAG in the freight rail electrification report. Each of these efforts highlights the technical opportunities and the need to pursue a zero-emission freight transportation system for the future. However, they also highlight the difficult challenges associated with this sector, especially with regard to operational needs, integration of the technologies into the national rail system, federal safety requirements, and costs.*

**Rail Comment:** SCAG should note that when the Ports' presented their evaluation of "zero emission" options in mid-2011, they concluded that, "none of the proposals were sufficiently mature to commit to a full-scale operational deployment or demonstrated they could deliver a reliable and financially sustainable system..."<sup>15</sup>

### **Comments on Project List appendix**

The Project List appendix includes a funding measure for over \$3.7 billion for further research and development of goods movement system improvements. It is unclear where the money will come from and for what specific improvements it will be used. SCAG needs to clarify the source of these funds, the specific priority of measures for which the funds will be used, and in what timeframe they will occur.

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<sup>15</sup> Port of Long Beach & Port of Los Angeles, "Roadmap for Moving Forward with Zero Emission Technologies at the Ports of Long Beach and Los Angeles" Technical Report, Updated August 2011, page 10.  
[http://longbeach.granicus.com/MediaPlayer.php?view\\_id=18&clip\\_id=4942](http://longbeach.granicus.com/MediaPlayer.php?view_id=18&clip_id=4942)

Page 422 of Project List appendix:

**Figure 8: Financially Constrained RTP Project List**

Financially-Constrained RTP Projects									
County	RTP ID	System	Route #	Route Name	From	To	Description	Project Completion By*	Project Cost (\$1,000's)
VARIOUS	7120005	STATE HIGHWAY		TRANSPORTATION SYSTEM MANAGEMENT	REGIONWIDE		INCREASED TSM INVESTMENTS (INCLUDES CSMP IMPROVEMENTS)	2035	\$2,271,364
VARIOUS	10M0702	LOCAL HIGHWAY					STUDY -- EXPRESS TRAVEL CHOICES (PHASE II) -- (CALTRANS IS THE LEAD AGENCY)	2013	\$4,000,000
VARIOUS	7120001	LOCAL HIGHWAY		ARTERIAL OPERATIONS & MAINTENANCE	REGIONWIDE		ADDITIONAL O&M AND PRESERVATION -- LOCAL STREETS & ROADS	2035	\$15,000,000
VARIOUS	7120004	OTHER		ACTIVE TRANSPORTATION	REGIONWIDE		INCREASED ACTIVE TRANSPORTATION INVESTMENTS	2035	\$4,448,509
VARIOUS	REG0703	OTHER		ARTERIAL OPERATIONS & MAINTENANCE	REGIONWIDE		ARTERIAL PRESERVATION/MAINTENANCE AND OPERATIONS PROJECTS	2035	SEE FINANCIAL PLAN LOCAL STREETS AND ROADS OPERATIONS AND MAINTENANCE COST
VARIOUS	7120014	OTHER		EAST-WEST FREIGHT CORRIDOR	I-710	JUST WEST OF I-605	EAST-WEST FREIGHT CORRIDOR SEGMENT 1 (UPRR ADJACENT SEGMENT)	2029	\$2,413,086
VARIOUS	7120015	OTHER		EAST-WEST FREIGHT CORRIDOR	JUST WEST OF I-605	JUST EAST OF SR-57	EAST-WEST FREIGHT CORRIDOR SEGMENT 2 (SAN JOSE CREEK SEGMENT)	2029	\$9,102,359
VARIOUS	7120018	OTHER		GOODS MOVEMENT BOTTLENECK RELIEF STRATEGY	REGIONWIDE		GOODS MOVEMENT -- BOTTLENECK RELIEF STRATEGY	2035	\$5,000,000
VARIOUS	RRC0703	OTHER		GOODS MOVEMENT RESEARCH AND DEVELOPMENT	REGIONWIDE		GOODS MOVEMENT RESEARCH AND DEVELOPMENT	2035	\$3,771,002

**Rail Comment:** SCAG identifies \$3,771,002,000 for ‘goods movement research and development’ as a part of the resource constrained plan in measure RRC0703. This language is vague and potentially misleading. The funding source is unclear, and is not mentioned in the Goods Movement appendix or in the RTP. SCAG needs to clearly identify the source of funds and their specific use.

- What technologies would ‘goods movement research and development’ cover?
- Why does the RTP ID begin with RRC – is that indicative of the intention to use these funds for rail technology development?
- Where could a reader find the write-up of RRC0703?

This vague placeholder for goods movement research and development has the potential to be interpreted differently by various stakeholders and needs to be clarified to avoid future conflict.

**Comments on Passenger Rail appendix**

The following comments pertain to various strategies and passages that concern the Railroads right-of-way (ROW) throughout the draft 2012 RTP and appendices. Prior to moving forward with some of SCAG’s passenger rail and goods movement environmental strategies, SCAG should ensure that issues will not arise with sharing ROWs. Failure to address these issues early on could result in increased congestion and emissions in the SCAG region.

## Page 16 Passenger Rail appendix:

*In the SCAG Region, this plan will be complicated by drive issues. While the Authority's HSTs will be electric drive, and powered by direct-overhead contact lines (often called catenaries), Amtrak and Metrolink currently operate diesel-electric locomotives, as do UP and BNSF. Moving forward, the region will have to reconcile the use of electric and diesel-electric locomotives in the same corridor; and resolve whether these two types of locomotives can share facilities. Blended operations may not be possible until these conflicts are resolved.*

**Rail Comment:** Before moving forward with this part of the passenger rail development, SCAG and/or the High Speed Rail Authority need to address whether the overhead catenary lines will interfere with freight railroad operations. Failure to reconcile this issue could result in major operational issues in the SCAG region and result in economic and environmental harm. SCAG should identify if funding has been allocated to study the potential issues with shared ROWs and what agency would decide if and how facilities can be shared. The Railroads should be included in all conversations and studies that address using rail facilities as to not adversely affect the goods movement system.

## Page 21 Passenger Rail appendix:

*Currently, rail service between downtown L.A. and the Coachella Valley is only provided three days a week with an unattractive schedule as part of Amtrak's interstate services. Union Pacific Railroad owns this rail corridor east of Colton and is opposed to implementing additional passenger service without large capital improvements. However, Amtrak retains the right to operate passenger service on freight-owned railroads and there is a process in place to resolve freight opposition, although Amtrak and other partners such as Caltrans DOR and RCTC may be required to fund capital projects to mitigate potential financial damages to Union Pacific. A 2010 RCTC study estimates \$75 million in station costs, \$40 million in equipment costs, and \$11.4 million in yearly operating costs to start this service. These figures do not include any capital costs required to mitigate service disruptions incurred by Union Pacific.*

**Rail Comment:** UP has entered into an agreement with SCAG member agencies to study the possibility of service to the Coachella Valley that would be served by whatever Amtrak service is currently provided in the region. There would be lost freight capacity to UP in providing such service that would have to be mitigated in some manner.

Page 19 Passenger Rail appendix:

*Phase II is from Madera to Sacramento and in our region from L.A. Union Station to San Diego through the San Gabriel Valley and Inland Empire. Phase II is in the Supplemental Alternatives Analysis phase and includes some alternative alignments in our region: either I-10 or SR 60 through the San Gabriel Valley, and either I-15 or I-215 from the Inland Empire to the San Diego County line. There is currently no funding for Phase II.*

**Rail Comment:** A portion of this analysis impacts UP owned ROWs. UP's position on this subject was best stated in its November 23, 2009 letter to the California High Speed Rail Authority providing scoping comments for the Los Angeles to San Diego via Inland Empire EIR/EIS.

UP owns the Los Angeles, Alhambra, and Yuma subdivisions ROWs in fee simple between central Los Angeles and the Colton – San Bernardino urban complex. UP controls the operation and maintenance of these subdivisions. No other carrier or government agency has the right to permit other railroads or rail operators to use any part of this ROW. These CTC-dispatched main lines, primarily single-track but with some segments of double track, form the western end of the vital Sunset Route and are the main conduits for movement of Pacific Rim containers out of the ports of Los Angeles and Long Beach. The importance of these subdivisions to the efficient movement of containers and other freight traffic cannot be overstated. Confirming prior statements, both written and oral, UP will not voluntarily make any part of these subdivisions available for the high-speed rail alignment.

The Railroads thank SCAG for their consideration of these issues and look forward to reviewing the final 2012 RTP/SCS. Please contact Max Pike at 415.421.4213 ex. 26 or Sarah Weldon at 415.421.4213 ex. 34 at any time should you have questions.

Sincerely,



Kirk Marckwald  
Principal, California Environmental Associates  
On behalf of Union Pacific Railroad, BNSF Railway and the Association of American Railroads

cc:  
Rich Macias, SCAG

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Dave Seep, BNSF

Juan Acosta, BNSF

LaDonna DiCamillo, BNSF

Mike Rush, AAR

Attachments:

*Draft Electrification Briefing Papers, September 2, 2011*



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February 14, 2012

Pam O'Connor, President  
Regional Council  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear President O'Connor:

We thank the leadership and staff of the Southern California Association of Governments and its Regional Council members for developing the agency's first-ever Sustainable Communities Strategy (SCS) and 2012 Regional Transportation Plan. This task was especially challenging given that it is the first time the region has put together an SCS.

The Department of Public Health supports many aspects of the RTP which will improve public health and air quality and lower greenhouse gas emissions by expanding public transit, promoting new development near transportation, and increasing investments for bicycle and pedestrian infrastructure.

The following recommendations are made to strengthen the RTP/SCS this year and in future years.

**1. Target and increase investment for active transportation**

We applaud SCAG's proposed increased investment in active transportation, from \$1.8 billion in the 2008 RTP (less than .5 %) to \$6 billion (1.3%) in the current draft plan. DPH strongly encourages that the final plan:

- Prioritize (i) first-mile/last-mile connections to transit stations which will help support the increased investment in the transit system; (ii) projects that close gaps in key bicycle and pedestrian corridors; and (iii) communities with high numbers of bicycle and pedestrian injuries and high rates of chronic disease.
- Front load active transportation funding so it is available to jurisdictions to build walkable and bikeable communities early on in the 25 year RTP period.
- Provide funding and technical assistance for cities to create bicycle and pedestrian plans and city-wide safe routes to school plans.
- Offer support to County Transportation Commissions (CTCs) and local jurisdictions to adopt a complete streets policy so that pedestrian and bicycle improvements can be made routinely and more economically when streets are improved or built.

In addition, the plan should include further investments in active transportation to create 1) basic bicycle and pedestrian infrastructure in key areas in every city in the SCAG region; 2) bikeable and walkable neighborhoods within ½ mile of all TODs, existing and planned; 3) complete routes to public schools throughout the region that children can walk and bike to; 4) sidewalks repair throughout the region; and 5) improved continuity in county bike networks.

This recommendation for additional investment is based on a recent DPH examination of cost data from local cities' bike and pedestrian plans and CalTrans Safe Routes to Schools grants in LA County, cost of sidewalk repairs in LA City, and costs for building pedestrian and bicycle improvements in Transit Oriented Districts. DPH used this data to estimate costs for needed bike and pedestrian improvements across the SCAG region.

Given that cities' bicycle and pedestrian master plans have a range of costs for proposed improvements, we present a range for the estimated amount of active transportation funding needed to generate these improvements across the region, from a low of \$37 billion (7.1%) to a high of \$60 billion (11.4%) over 25 years, adjusted for inflation. We recognize that there are many factors that must be considered in your resource allocation decisions and, therefore, do not provide these estimates as a recommendation for funding. However, given the region's long standing underinvestment in bike and pedestrian infrastructure, we feel this is an appropriate range of investment options for your consideration.

### **2. Build healthy neighborhoods around transit stations that protect existing low-income residents**

The area around rail stations offers a unique opportunity to create safe access to transit and to address key community needs such as mixed-income housing and business/retail corridors within a walkable and bikeable community setting. However, without careful planning, the people in neighborhoods adjacent to rail stations can be displaced as real estate prices rise in response to new development, triggering corresponding increases in residential and commercial rents for low-income families and small business owners. DPH encourages that the plan:

- Prevent displacement of existing low-income residents, fund jurisdictions to create transit-oriented development (TOD) plans that include policies to preserve existing affordable housing and small business store fronts and to ensure the provision of affordable housing and small business store fronts in new developments.
- Whenever possible, locate housing, child care facilities, schools and other sensitive-use development far enough away from sources of pollution to decrease exposure that can negatively affect health.

### **3. Strengthen public health modeling and monitoring**

We encourage SCAG to measure the public health impacts of transportation investments. For example, the RTP could be analyzed for its potential to reduce chronic diseases in the SCAG region, such as heart disease and breast cancer, based on increases in walking and biking, linked to active transportation scenarios. Specifically, DPH encourages SCAG to:

- Measure the health benefits of transportation plans by integrating health outcomes into SCAG's modeling approaches.
- Measure and report on additional public health indicators including but not limited to: bicycle and pedestrian injuries and collisions by geographic areas; percentage of households that can walk or bike within 10 minutes to reach their daily destinations, e.g. transit, schools, childcare, parks; percent of income consumed by housing and transportation costs.
- Conduct targeted analyses in neighborhoods adjacent to rail stations to determine if displacement of existing residents is occurring as development occurs.

Pam O'Connor  
February 14, 2012  
Page 3

We express our appreciation to the SCAG Regional Council and staff for your hard work to develop this RTP/SCS and to guide Southern California's land use and transportation investments wisely. We look forward to working with you to make our neighborhoods and our region healthier for existing and future residents.

Sincerely,

A handwritten signature in cursive script that reads "Paul Simon".

Paul Simon, M.D., M.P.H.  
Director, Division of Chronic Disease and Injury Prevention

February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

President O'Connor and Southern California Association of Governments Regional Council Members:

**The Center for Community Action and Environmental Justice** appreciates the efforts of the Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the concerted efforts put forth in the draft towards improving the transportation system which also includes some measures to address Public Health and Air Quality in our region.

We have joined with other concerned organizations to outline comments on the plan and incorporate those comments with ours, however we do have some specific concerns which we feel will directly impact our communities in the City of Jurupa Valley (formerly known as unincorporated Mira Loma community in Riverside County) and the City of San Bernardino Westside communities.

The communities in the Jurupa area have for many years seen an influx of warehousing slowly encroaching into our neighborhoods. Many of these projects are at the fence line of homes and schools. Residents in close proximity to highways, and busy streets with high levels of diesel truck traffic, will experience increased incidents of asthma, cancer risks, cardiovascular and respiratory disease, premature mortality, decreased life expectancy, reproductive health problems.

**Components of the Regional Goods Movement System**

SCAG has addressed the fact that the Inland Valley is already home to (2008) about 837 million square feet of warehousing space with another 185 million square feet in developable land. An estimated 15 percent of the occupied warehouse space served port-related uses while the remaining 85 percent supported domestic shippers. National and regional distribution facilities tend to be located in the Inland Valley and concentrated in the Jurupa Valley/Fontana area. The impacts to the surrounding communities from the diesel spewing trucks drawn to these warehouses create severe health outcomes and disruption of the quality of life for local families. SCAG must address these impacts in a significant manner as to minimize to the furthest extent possible the environmental and health risks posed from exposure to diesel exhaust.

The implementation of specific truck routes to keep truck traffic away from communities of concern as project specific strategies tend not to address specific impacts to these communities. Other measures such as establishment of green zone/buffer area between diesel sources and residents of at least 1000 feet are necessary to be protective of residents in close proximity. Additional mitigation measures of trees and foliage that help to trap many of the ultra fine particles to lessen the impacts to communities

of concern, sound walls to lessen the noise pollution from residential areas that are too close to freeways and heavily traveled thoroughfares.

### **Regional Clean Freight Corridor System**

The truck corridor that SCAG has proposed will heavily impact the inland valley communities as SCAG has indicated the increase of truck traffic to our area will grow from 58,000 to 70,000 trucks per day although these trucks would be removed from general purpose lanes when they get to Interstate 15 and State highway 60. That traffic will then be dumped into our communities at a rate that will create an even greater health crisis for our communities. The disregard for the impacts of the plan upon the Inland Valley communities south of the 15/60 interchange must be addressed. The residents can't wait until 2035 for a solution to this huge impact. Goods movement strategies must ensure that the South Coast air basin meet federal air quality standards set forth in the Clean Air Act. The technologies mentioned must be required for future projects and incorporate these technologies or they should not be built. The RTP/SCS must remove the East-West Corridor Route Project.

Recommending building an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the entire region, and particularly for local communities of concern as previously stated.

Communities like the City of San Bernardino Westside are an example of one of the worst impacted by the BNSF Intermodal Railyard which after a health risk assessment conducted in 2008 found that residents living in close proximity faced an increased cancer risk from diesel emissions as much as 15 times higher than the Union Pacific Railyard UP in Colton and 3 times higher than any other railyard in the region. To these residents the point of maximum impact is 3,300 people in a million are at greatest risk.

The RTP/SCS must focus attention on cleaning up existing freight corridors. Rail companies should not expand until rail yards like San Bernardino's BNSF Facility implement zero emissions technology. These communities with the highest health risk cannot wait until 2030 for solutions. As freight transport increases, SCAG must encourage the incorporation of evolving technologies to specific high risk areas first and not just for proposed new projects. SCAG should use the highest polluting facilities for testing and evaluation, as well as for the use of advanced technology locomotive demonstrations.

The public health evidence is insurmountable to deny. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, as well as those communities of concern and not just the region's economic growth.

**The Center for Community Action and Environmental Justice**  
**Penny Newman Executive Director**



City of  
**SANTA CLARITA**

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196  
Phone: (661) 259-2489 • FAX: (661) 259-8125  
[www.santa-clarita.com](http://www.santa-clarita.com)

February 14, 2012

Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017

Dear Mr. Ikhata:

Subject: Comments Regarding the 2012 Draft Regional Transportation Plan and Regional Transportation Plan Program Environmental Impact Report

Thank you for the opportunity to provide comments on the Regional Transportation Plan (RTP) and the Program Environmental Impact Report (PEIR) for the Regional Transportation Plan. The City of Santa Clarita (City) has identified questions and comments in three chapters of the RTP and on several mitigation measures included in the PEIR. For ease of reference, comments and questions appear in *italics*.

The purpose of the RTP is to provide a blueprint for future transportation projects and strategies throughout the Southern California Association of Governments (SCAG) region through 2035. Included within the RTP is a financial plan that identifies funding available to support the region's transportation investments, including transit, highways, local road improvements, systems preservation, and demand management goals. Central to the financial plan is the identification of funding resources the RTP identifies as "reasonably available" for future projects. The City has prepared the following comment regarding the financial plan included within the RTP (Chapter 3):

*Based on its identification as a "reasonably available" funding resource, the City requests additional information on increased gas taxes or mileage-based user fees as mandatory action items. Over 50 percent of commuters that live in the City work outside of the Santa Clarita Valley. As a result, an increase in gas tax or a mileage-based user fee could result in significant financial impacts on the local labor pool (Page 95, Table 3.3).*

As required by Assembly Bill 32 and Senate Bill 375, this cycle's RTP includes a Sustainable Communities Strategy (SCS). The SCS functions as a mechanism to ensure the SCAG region can achieve mandated greenhouse gas (GHG) reductions of 8 percent per capita by 2020 and 13 percent per capita by 2035. The draft SCS included in the RTP concludes these targets can be met through a specific land use scenario, called Scenario 2. The scenario was compiled using a variety of data inputs, including a series of workshops hosted by SCAG in a number of



communities throughout the region and by working directly with staff at local jurisdictions. The SCS then models GHG based on a variety of factors. Central to Scenario 2 is a shift from larger lot residential development to smaller lot residential development, including more emphasis on multifamily housing. In addition, the scenario assumes a much higher level of infill and mixed-use development than historical development patterns. The City has prepared the following questions and comments regarding the SCS (Chapter 4) of the RTP:

*For clarity, the scenarios in the RTP should be titled in a consistent manner with the alternatives included in the Sustainable Communities Strategy (SCS) background documentation. The City assumes "Scenario 2" from the RTP is the same as "Alternative B" in the SCS Background documentation.*

*Throughout the chapter, the RTP refers to Appendix 19. SCAG staff has indicated Appendix 19 is now referred to as the "SCS Background Documentation," however, this is not reflected in the current draft (Page 112).*

*Whereas, Santa Clarita agrees with the assumptions contained in land use Scenario 2 for the region, it should be noted it is unlikely a similar pattern will occur in the Santa Clarita Valley. Although the City's new General Plan, adopted in June 2011, stresses mixed-use and transit-oriented development, significant green-field development is still contemplated within the time horizon of the RTP (Page 115, Figure 4.3).*

*It is unclear how the two areas identified in Ventura County can be considered "urban areas" on par with those identified in Los Angeles, Orange, Riverside, and San Bernardino counties. By comparison to those areas identified in Ventura County, the State Route 14 (SR-14) corridor between the cities of Santa Clarita, Palmdale, and Lancaster services a local population of over 700,000 residents and represents a substantial proportion of the new growth in Los Angeles County (Page 125, Exhibit 4.5).*

*One of the three High Quality Transit Areas referenced in the exhibit is the Downtown Newhall area. This area is defined by the Downtown Newhall Specific Plan and is the primary focus of the City's former Redevelopment area. However, given the uncertainty surrounding former redevelopment areas, it is unlikely this location will be able to provide the same type of transit-oriented development and infill contemplated by the Downtown Newhall Specific Plan (Page 134, Exhibit 4.9).*

The RTP includes future projects in at least two sections: the Constrained List, which is comprised of projects that have identified funding, and the Strategic Plan, which is comprised of projects requiring more study and which lack identified funding. The City has prepared the following comment regarding projects included in the Strategic Plan and not included in the Constrained List (Chapter 7):

*SCAG should consider including the Orangeline High-Speed Transit Project (Union Station to Santa Clarita) in the Constrained List rather than the Strategic Plan, due to the*

*fact the Los Angeles County Metropolitan Transportation Authority has recently accelerated the evaluation of rail improvements along the Antelope Valley Line (Page 196, Table 7.1.).*

As part of our review, the list of Constrained Projects was compared to the schedule of projects included on page nine of the "Measure R Highway Program" report released in January 2012 by the Los Angeles County Metropolitan Transportation Authority (Metro). The City has identified two discrepancies between the two documents and is seeking clarification. The discrepancies are as follows:

*Metro's list of highway projects indicates completion of Interstate 5 (I-5) truck lanes (Phase 1) from SR-14 to Pico Canyon Road by 2014, while the Financially-Constrained RTP Project List indicates completion of this same project by 2016 (RTP Technical Appendices, page 154).*

*Metro's list of highway projects indicates completion of I-5 truck lanes and HOV lanes (Phases 2 and 3) from SR-14 to Parker Road by 2025, while the Financially-Constrained RTP Project List indicates completion of this same project by 2017 (RTP Technical Appendices, page 155).*

The PEIR evaluates potential environmental impacts associated with the adoption of the RTP. The PEIR is a first tier document for later CEQA review of individual projects included in the program. Included in the PEIR is a list of over 500 mitigation measures to help reduce identified impacts.

In general, the document is unclear regarding whether mitigation measures that impact local governments are mandatory or voluntary. It is also unclear which agency will be monitoring mitigation measures that impact local governments and what the process for local governments to demonstrate compliance will be. *As a result, the City seeks clarification on whether potential lack of compliance with mitigation measures impact local government's ability to receive future transportation funding.*

The City has prepared the following questions and comments regarding mitigation measures contained in the PEIR:

Mitigation Measure GHG9 identifies the need for member cities and counties to adopt Climate Action Plans (CAP) and outlines no fewer than 14 information items that should be included in the CAPs. The City is in the process of creating its own CAP with an anticipated completion date of summer 2012 and seeks clarification on the following points:

*It is unclear if and/or how the City should link its current Climate Action Plan (CAP) process with this item and if the City is able to take credit for any GHG reductions included locally within the SCS.*

Mitigation Measure LU84 states that local jurisdictions should provide incentive funding and other incentives to support desired projects. The City is requesting clarification on the following point:

*The City seeks clarification on the definition of "desired land uses and projects."*

Mitigation Measure LU85 calls for local governments to reduce street widths to Pre-World War II dimensions.

*The City feels reducing street widths to Pre-World War II widths is impractical and not financially feasible.*

Mitigation Measure PS78 calls for local governments to encourage green-building practices in development projects and encourages the use of Leadership in Energy and Environmental Design (LEED) standards as models. However, with California's adoption of the CalGreen Building Code in 2010, the LEED model has become largely obsolete. The City has prepared the following comment:

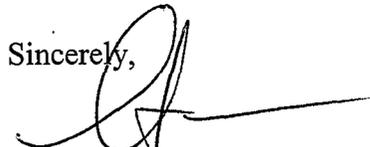
*The City's preference would be for SCAG to incentivize cities to adopt Tier 1 or Tier 2 guidelines included in CalGreen rather than reference a variety of independent programs.*

Understanding the RTP is a regional document encompassing six counties and nearly 200 cities, it is important to note not all of the identified mitigation measures can be applied to each of the member jurisdictions equally given their wide range of socioeconomic, urban, geographic, and demographic conditions. The City has prepared the following comment regarding three mitigation measures:

*The City feels the following mitigation measures are more appropriate for dense, urban centers than for suburban and rural areas of the SCAG region: TR59, TR63, and TR83:*

We look forward to working with you and your staff now and in the future on this and other projects. Should you have questions, please contact me at (661) 284-1429 or at [newman@santa-clarita.com](mailto:newman@santa-clarita.com). I am available at your convenience.

Sincerely,



Robert Newman,  
Director of Public Works

RN:DP:lep

S:\CD\Dave Peterson\Green Team\375\RTP SCS Document 2012\RTP and PEIR Comments 2 14 12 REDRAFT 1.doc

cc: Jeff Hogan, Interim Planning Manager  
Andrew Yi, City Traffic Engineer

## Rachel Morris

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**From:** Rachel Morris [rachel.earth@gmail.com]  
**Sent:** Tuesday, February 14, 2012 4:50 PM  
**To:** 'rtp@scag.ca.gov'; 'lin@scag.ca.gov'; 'John Procter'  
**Subject:** Signatures supporting increased funding for Active Transportation

Dear SCAG and Margaret,

I am the executive of a Ventura local non-profit started in 2007 that works to reduce climate change. VCCool (Ventura Climate Care Options Organized Locally), can be found at [www.vccool.org](http://www.vccool.org).

First thank you for all you've done to engage the community in the RTP and SCS effort for 2012. I especially appreciate the 18 Workshops in the SCAG region because that help our organization to learn of SCAG and the critical effort of the Regional Transportation Plan. We would also like to thank the Safe Routes to School Partnership for helping us to become engaged.

Our concern is that a large body of the population is not currently represented in your 2012 RTP draft. These are the people who bicycle, who walk, or who would like to use Active Transportation but are too afraid because of the real threat of them or their children being killed or injured inadvertently by people in automobiles.

To this end we have collected 1,241 signatures from people across the SCAG region urging you to reconsider the small, and delayed funding for a clean, green, economical form of transportation who is now receiving 25% of traffic fatalities in the SCAG region. Our on-line petition and video can be found out [www.active-transit.org](http://www.active-transit.org)

We will post the signature files to Drop Box so you can download them.

Here is the break down, and what you will find in our SCAG dropbox folder:

- 775 online signatures, including name, zip, e-mail, plus comments from many of the signers
- 355 paper petition signatures including name, zip, and e-mail address
- 111 youth/student signatures – including name of student.

Concerning files, I am including:

- The composite of the online signatures,
- Jpg files of scanned adult signatures that came in on paper
- A letter explaining the youth signatures from one of the teachers.
- An excel with the unique signatures. (The kids signed multiple times for emphasis, so we went through and typed a list of the unique names, deleting any duplicates.

I would also like to include this link to a front page article in our county-wide newspaper. It was on the front page of the Ventura County Star, with the printed version headline "Bicyclists Demand Respect."

<http://www.vcstar.com/news/2012/feb/12/petition-drive-for-more-bicycle-safety-in-scag/>

We urge you to rethink the delay in funds for Active Transportation, and we urge you to increase funds budgeted in the RTP. Please do not hesitate to call me if you would like to meet, or if you have any questions about our petition, our effort, or anything else.

**To find the actual petition information please go to [www.dropbox.com](http://www.dropbox.com) in VCCool's SCAG RTP Petition 12, and download the files therein.**

Warmly Yours,

*Rachel Morris*

VCCool Executive Director

[www.vccool.org](http://www.vccool.org)

office (805)648-1267

cell (805)258-9369

*VCCool is a Climate Change Action Group dedicated to engaging the people of Ventura to reduce greenhouse gasses. We strive to influence policy, provide tools and expertise for lifestyle change, support a localized green economy, and foster a grass-roots community that supports sustainable living.*



# MARCH JOINT POWERS AUTHORITY



February 14, 2012

Margaret Lin  
SCAG  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**SUBJECT: COMMENTS ON THE DRAFT RTP/SCS**

Dear Ms. Lin:

The March Joint Powers Authority (JPA) is pleased to submit comments on the 2012-2035 Draft RTP/SCS. We recognize that SCAG has put a significant amount of time and energy into the creation of this document. March JPA has the following comments after reviewing the Draft document:

- 1) Chapter 4 – Sustainable Communities Strategy: Exhibit 4.18, Land Use Pattern Riverside County (2035) identifies a “High Quality Transit Opportunity Area” located along Alessandro Boulevard in proximity to Interstate 215, within the City of Riverside, City of Moreno Valley, unincorporated Riverside County and March Joint Powers Authority. The concentration of high density residential and/or high intensity commercial uses along portions of the Alessandro corridor would conflict with the airport Accident Potential Zones as defined in the 2005 March Air Reserve Base Air Installation Compatibility Use Zone (AICUZ) study, and further conflict with the recommended airport compatibility provisions identified in the draft Joint Land Use Study currently undergoing environmental review by the Riverside County Airport Land Use Commission. While transit is encouraged by these plans, the proposed increase in densities/intensities in this area of high noise and airport safety concerns necessitates detailed analysis, best performed by the Riverside County Airport Land Use Commission and March Air Reserve Base.

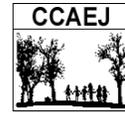
Again, we thank you for the opportunity to provide comments. Should you have any questions please contact me at (951) 656-7000.

Sincerely,

Dan Fairbanks, AICP  
Planning Director

cc: Ed Cooper, Executive Director, Riverside County Airport Land Use Commission  
Pamela Hann, March Air Reserve Base Civil Engineer  
Steve Hayes, Interim Planning Director, City of Riverside  
John Terrell, Planning Official, City of Moreno Valley

attach: 2005 March Air Reserve Base Air Installation Compatibility Use Zone Study  
2010 draft March Air Reserve Base/Inland Port Joint Land Use Study



BLACK WOMEN FOR WELLNESS



February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

Dear President O'Connor and Southern California Association of Governments Regional Council Members:

The undersigned appreciate the dedication and efforts of the staff at Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the recommendations in the plan that moves the region towards an improved transportation system while improving public health and air quality.

The 2012 RTP/SCS includes many smart growth strategies that will increase mobility, public health and environmental health standards. As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to:

- *Increase investment in active transportation strategies.*
- *Acknowledge that a regional zero emission freight system is needed in the region.*
- *Discuss gentrification issues as part of Environmental Justice.*
- *Monitor premature mortality due to PM2.5.*

Though SCAG has shown commitment to improving the region's *mobility, economy and sustainability* by including public health analysis in transportation planning policies, more can still be done to improve air quality, increase equity and improve our goods movement system.

The SCAG region faces immense public health and environmental challenges, and the RTP/SCS must be enhanced to address these issues. The SCAG region continues to have the worst air quality in the nation and contains "14 non-attainment and maintenance areas in four air

basins”<sup>1</sup>. Additionally, SCAG recognizes that 25% to 27% of the population “within the freeway adjacent areas are projected to see increases in their emission exposures to CO and PM”<sup>2</sup>. According to Figure 46 in the Environmental Justice Appendix, close to 60% of the population residing within 500 feet from the buffer area are Hispanic and in Quintile 1 (The Lowest Income Household). The issues of air pollution are even more acute in the SCAG region given the rampant prevalence of diesel equipment used in the freight industry. Residents in close proximity to highways, particularly those with high levels of diesel trucks, will experience increased rates of cardiovascular and respiratory disease, premature mortality, increased lung cancer incidence, decreased life expectancy, reproductive health problems, and increased asthma symptoms<sup>3 4 5 6</sup>. While we recognize that the goods movement sector is an economic driving force in the region, we cannot sit by idly and allow the immense damage to the health of our most vulnerable communities persist.

Given these challenges, we recommend several improvements that must be made to improve the RTP/SCS.

### **I. The RTP/SCS Must Do More To Promote Public Health Protections, Active Transportation and Equity.**

The RTP/SCS is the blueprint for years to come. As such, it must be designed to promote public health through choosing better transportation alternatives and making sure we spread the benefits of these investments to all residents in the region, regardless of race, income, or other social status. Moreover, we must make sure we minimize exposure to environmental harms.

### **II. The RTP/SCS Must Invest and Include Healthy and Equitable Policies.**

Implementing this recommendation requires addressing the following critical public health issues:

#### *A. Mitigate PM and CO exposure in high quality transit areas.*

The 2012 RTP/SCS will redirect 51% of new housing near High Quality Transit Areas (HQTA) providing an opportunity for healthy communities. Redirecting the growth of new housing closer to busy roads and freeways could violate the California Air Resources Board’s recommended 500 feet freeway buffer, and potentially increase CO and PM exposure and noise impacts. SCAG has acknowledged that 25% to 27% households living within freeway adjacent areas will see increases in their emission exposure to CO and PM. In addition to monitoring these areas for PM and CO, we recommend that SCAG also project and map out the areas that may be impacted as a result of the redirected growth up to the year 2035. We also recommend for SCAG to include current mitigation strategies in the EJ Toolkit and work with the local communities, health advocates and stakeholders to continue developing policies that will be included as part of the mitigation strategies for HQTA.

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<sup>1</sup> Pg. 18, VISON APPENDIX

<sup>2</sup> Pg. 122, EJ APPENDIX

<sup>3</sup> California Air Resource Board. Air Quality and Land Use Handbook: A Community Health Perspective. 2005. <http://www.arb.ca.gov/ch/landuse.htm>.

<sup>4</sup> Brunekreef B, Janssen NA, Hartog J. 1997. Air Pollution from truck traffic and lung function in children living near motorways. *Epidemiology* 8:298-303.

<sup>5</sup> VennAJ, Lewis S, Cooper M, Hubbard R, Britton J. 2001. Living near a main roadway the risk of wheezing illness in children. *Amer J Resp and Critical Care Med* 164(12):2177-80.

<sup>6</sup> Various studies:

Gauderman, W. James, Ph.D, et al., *N Engl J Med* 2004; 351:1057-1067.

Jun Wu et al., *Environmental Health Perspectives* 2009; 117: 1773-9.

McConnell, Rob MD et. al., *Lancet* 2002; 359:386-391.

Arden, Pope C III, PhD et al., *JAMA* 2002; 287; 1132–1141.

*B. Mitigate highway noise areas in communities of concern.*

Highway noise areas are also disproportionate to environmental justice communities with 22% of the affected population residing within roadway noise areas and 14% of the households below the poverty line<sup>7</sup>. Noise impacts have been associated with hearing impairment, hypertension and ischemic heart disease annoyance and sleep disturbance<sup>8</sup>. Further noise impact mitigation studies should be utilized in future 2012 RTP/SCS plans.

*C. Monitor and develop tools to avoid gentrification and displacement in TODs.*

SCAG's current analysis of 125 HQTAs around rail stations found that the demographics of HQTAs/TOCs are changing. Poverty rates are declining in these areas when compared to the rest of the region<sup>9</sup>. These results show that displacement and gentrification may be occurring in these areas. As such, gentrification should be acknowledged and policies need to be put in place to avoid this from happening. In addition to tracking the 125 rail stations, SCAG should:

1. Track commute time by race and income in Communities of Concern (COCs) and compare it to the region.
2. Set a baseline for jobs-housing fit by taking a "snap shot" of 4-to-5-mile buffer zone around major job centers, and compare the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good jobs-housing fit. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas.
3. Use the Compass Blueprint Program to advance a policy toolkit that highlights and recommends anti-displacement and anti-gentrification policy options in TOD areas, as an eligible subject for a Compass Blueprint grant proposal.

**III. The RTP/SCS Must Ensure That the Region has a Complete Network of Transportation Strategies that Connect Travelers to a Wider Range of Transportation Options.**

This entails implementation of the following recommendations:

*A. Increase investment in active transportation.*

In order to achieve true walkable and healthy communities we recommend for SCAG to increase its investments in Active Transportation strategies beyond the \$6 billion currently recommended.

*B. Increase investment in public transportation.*

Prioritize investment in bus rapid transit and taking existing infrastructure to include bus-only lanes instead of expanding highway to accommodate for additional capacity.

*C. Access, mobility and safety.*

In order to better connect the region that depends on non-motorized modes of transportation, first-mile/last-mile strategies should also include close-the-gap strategies that integrate active modes of transportation to allow for accessibility to employment and services. To better do this, SCAG should identify geographic areas with high concentrations of communities of concern and track their transportation access, cost, mobility, rent, and gentrification and displacement patterns

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<sup>7</sup> Pg. 127, EJ APPENDIX

<sup>8</sup> Passchier-Vermeer, W. and Paschier F., W. Noise Exposure and Public Health. *Environmental Health Perspectives*, *Environmental Health Perspectives* 108(1):123-131, March 2000.

<sup>9</sup> Page 93, EJ APPENDIX

(using the seven indicators to track early signs of displacement or gentrification)<sup>10</sup>. The data can be used in future RTP/SCS and determine where close-the-gap strategies would best serve the region and address any adverse impacts that transportation projects can cause to communities of concern. SCAG should also use the data to determine what communities are underserved by transportation projects and connect those underserved communities to high opportunity areas.

#### **IV. SCAG Must Support Federal Policies That Benefit Active Transportation.**

Given the current state of the federal transportation bill and efforts to strip dedicated funding from MAP-21 in the Senate and the House American Energy and Infrastructure Jobs Act in the House, we are concerned that expected federal revenues for bicycle and pedestrian enhancements may not materialize.

To this end we request that SCAG fully support an amendment offered by Senator Lautenberg in the EPW Committee to ensure that total funds available in the “additional activities” reserve fund in MAP-21 for Recreational Trails, Safe Routes to School, and bicycle and pedestrian investments are equal to those currently in SAFETEA-LU. Additionally, this amendment would ensure that regions within states are able to have direct and first access to these funds so that cities throughout the SCAG region are able to directly apply for and receive funding for important bicycle and pedestrian projects. As the Senate bill progresses to the floor there will be opportunities for Senator Boxer to incorporate these provisions into the final bill and it is important for SCAG to make clear it supports them.

#### **V. The Freight Strategies in the RTP/SCS Must Be Improved.**

We remain deeply concerned about the freight elements of the RTP/SCS. While the plan acknowledges the need to move to zero emissions technologies, it provides little substance on how it will actually happen. The RTP must be more rigorous. To support this, we suggest the following improvements to the freight elements of the plan.

##### *A. The RTP/SCS must actually require creation of a zero-emission truck and freight goods movement for the region.*

Several issues must be addressed in the 2012 RTP/SCS before it is adopted with regard to how freight is moved through the year 2035. Goods movement strategies must ensure that the South Coast Air Basin meet federal air quality standards set forth in the Clean Air Act. Currently, the plan provides little detail on this issue, including how black box reductions will be achieved from the substantial portion of emissions from freight. While we agree with the many experts who “question the long-term viability of continued reliance on fossil fuels,” the RTP/SCS lacks details on how best to actually achieve this goal<sup>11</sup>. The “uncertainty of a petroleum-based future” needs to be at the forefront of the 2012 RTP/SCS where any expansion plans that increase a petroleum-based roadway system and raise Vehicle Miles Travel (VMT) must be curtailed<sup>12</sup>. The RTP/SCS needs to do more than just put words on paper about the need for this system. Future projects must be required to incorporate these technologies or they should not be built.

Financing these cleaner technologies is an important consideration for SCAG. Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero

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<sup>10</sup> Pg. 93, EJ APPENDIX

<sup>11</sup> Pg. 29, DRAFT 2012 RTP/SCS

<sup>12</sup> Pg. 29, DRAFT 2012 RTP/SCS

emission freight and truck strategies should be a central component of the strategy. For these reasons, we recommend that SCAG consider including the following funding strategies:

1. Develop a clear assessment of various financing options including various models of public-private partnerships that could make zero-emission technology options possible. Recommend a \$30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports<sup>13</sup>.
2. Use currently available clean truck technology and incentivize it through funding and or by way of preferential access lanes at terminals.
3. Reinststitute the diesel truck fee to incentivize clean, alternative fuel trucks.
4. Improve fee structure to give preference to clean alternative fuel trucks.

*B. The RTP/SCS must implement near-term solutions to reduce greenhouse gas emissions from freight.*

We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the 2012 RTP/SCS in other areas. In particular, CO<sub>2</sub> emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035. Even more dramatically, CO<sub>2</sub> emissions from rail would increase at least 50% by 2023 and at least 123% by 2035<sup>14</sup>.

Given that “This RTP Goods Movement Environmental Strategy was developed to address community concerns, federal attainment requirements, and *climate change issues*,” it is problematic that near-term solutions are not more fully articulated<sup>15</sup>. Near-term strategies to clean up goods movement must be fully integrated into the 2012 RTP/SCS. We would like to work with you before the final version of the 2012 RTP/SCS to resolve this deficiency. Indeed as stated “For trucks, an aggressive program to bring more currently available, clean fuel trucks and hybrid trucks into service represents the best near-term strategy”<sup>16</sup>. Yet no such program is identified for either trucks or rail.

The ports of Los Angeles and Long Beach have left a gaping hole in clean air planning by not establishing targets and reduction plans for greenhouse gases (GHGs). SCAG and the 2012 RTP/SCS should demand that the Clean Air Action Plan be augmented with GHG reduction plans. Both ports have in the past promised to have such plans but neither has released one<sup>17</sup>. Such plans should complement and accelerate SCAG’s vision for increased efficiencies and the deployment of cleaner technologies.

While we commend the steps to evaluate and seek funding for longer-term zero and near-zero emissions technologies, the severity of the pollution and congestion from freight activities merits additional attention in the near-term. And while the 2012 RTP/SCS rightly considers heavy-duty trucks and rail emissions, it would be worth devising a set of strategies that account for the differences among local freight service and that of port origin/destination. Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector’s 2<sup>nd</sup> largest emitter of NO<sub>x</sub><sup>18</sup>.

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<sup>13</sup> Haveman, Jon, and Thornber, Christopher. Container Fees and Commercial Benefits of Improved Waterborne Goods Movement Infrastructure in California. *Beacon Economics*. August 2007. [http://www.coalitionforcleanair.org/images/stories/Haveman\\_Report\\_Final\\_Aug2007.pdf](http://www.coalitionforcleanair.org/images/stories/Haveman_Report_Final_Aug2007.pdf)

<sup>14</sup> Pg. 33, GOODS MOVEMENT APPENDIX

<sup>15</sup> pg. 33, GOODS MOVEMENT APPENDIX, emphasis added

<sup>16</sup> Pg. 39, GOODS MOVEMENT APPENDIX

<sup>17</sup> POLB has initiated a GHG mitigation fund to attempt to offset some of its increased emissions

<sup>18</sup> Pg. 32, Figure 8, GOODS MOVEMENT APPENDIX

In the section On-Dock/Near-Dock Rail Capacity Enhancements, the 2012 RTP/SCS appropriately expresses preference for on-dock rail “By allowing more on-dock rail, truck traffic between the San Pedro Bay Ports and distant rail yards can be reduced. Use of on-dock rail eliminates truck vehicle miles of travel (VMT) and associated emissions”<sup>19</sup>. SCAG should demand a sequencing of projects that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost.

#### **VI. The RTP/SCS Must Remove the East-West Corridor Route Project.**

Recommending to build an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the region and particularly for local communities of concern (COC). Additionally, if the east-west corridor project goes forward, an increase in truck traffic per day (from 58,000-78,000) could increase noise pollution and air pollution<sup>20</sup>.

*The Goods Movement Environmental Strategy and Action Plan* schedules full operational deployment of zero and near zero-emissions for trucks in 2018<sup>21</sup>. This plan prematurely predicts that the infrastructure, market and technology will be available for use without taking into consideration funding shortfalls and without putting in place earlier interventions. In the meantime, east-west corridor adjacent communities will be adversely impacted by displacement, or over-burden suffering from adverse health and quality of life impacts associated with the construction of the project and the trucks that will eventually utilize the route. SCAG must go beyond investing in research and guarantee that all lanes classified as zero-emission truck-only lanes only be used by zero-emission trucks.

Before considering adding this project to the RTP/SCS, SCAG must address the following:

1. Provide health and community demographic data on impact on the east-west corridor project. Specifically data that shows potential neighborhoods which may be displaced, noise and air quality impacts on surrounding communities, race, class, socio-economic status of the communities that will be impacted and how many of them are COCs.
2. Develop an analysis of the local roadway systems that trucks will utilize once they have reached their destination.
3. Develop an analysis of the total number of on-ramps and off-ramps planned for the east-west corridor, an approximation of where they will be (i.e. which streets will be used for entering and exiting the east-west corridor), and the configuration/style of each on-ramp and off-ramp.
4. Define the performance measures that would outline how success would be measured for the proposed east-west corridor, including anticipated truck traffic counts.
5. Set outreach and communication guidelines that allow for greater public participation from the general public and pertinent partners and timely feedback to questions asked.
6. Include an outreach and engagement plan that includes impacted COCs, stakeholders and health advocates, as part of the Goods Movement and Environmental Strategy Action Plan.

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<sup>19</sup> Pg. 27, GOODS MOVEMENT APPENDIX

<sup>20</sup> Pg. 20, GOODS MOVEMENT APPENDIX

<sup>21</sup> Pg. 21, GOODS MOVEMENT APPENDIX

## **VII. SCAG Must Support National Efforts to Create a Strategic Plan for the Freight System.**

Given the limitations with funding our goods movement and particularly the zero emissions and near zero emissions freight strategy, we encourage SCAG to include language that clarifies the current federal funding constraints and alter the 2012 RTP/SCS to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100. As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding and the establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Senate and House.

SCAG should actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program, and support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written. We support the addition of this language as offered by Senator Lautenberg and the inclusion of Senator Lautenberg's FREIGHT Act of 2011 (Focusing Resources, Economic Investment, and Guidance to Help Transportation) in the Commerce Committee bill S. 1950 the Commercial Motor Vehicle Safety Enhancement Act of 2011 which would create a national strategic plan for the freight system, a competitive grant program, and establish clear goals and objectives including reducing emissions, improving safety and efficiency, enhancing economic competitiveness, use of innovative technologies, and improving the state of repair of existing infrastructure.

## **VIII. The RTP/SCS Must Focus Attention on Cleaning Up Existing Freight Corridors, Not Just the Proposed New Projects.**

While we welcome zero emission technology by the year 2035, more short term gains must be implemented. SCAG should incorporate what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology). Additionally, SCAG member governments must include a zero emission corridor from the ports to the ICTF or along Alameda Street and strengthen specific requirements in new projects beyond "bare minimum" standards used in current projects.

## **IX. The RTP/SCS Must Include Public Health as an Overarching Goal of the Goods Movement Element.**

More and more research is associating air pollution with asthma prevalence, poor lung function and a series of other health impacts. The California Air Resources Board states that the "prevalence of asthma in the U.S. has increased by more than 75% since 1980"<sup>22</sup>. Furthermore results from the USC Children's Health Study, a ten year study, show that children in Southern California's more polluted communities "suffer reduced growth of lung function, asthma exacerbations, more school absences, and new onset asthma"<sup>23</sup>. The public health evidence is growing. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, and not just the region's economic growth. SCAG must:

<sup>22</sup> California Air Resources Board. Asthma and Air Pollution. <http://www.arb.ca.gov/research/asthma/asthma.htm>, May 25, 2010.

<sup>23</sup> Hricko, Andrea M. Road to An Unhealthy Future for Southern California's Children. *University of Southern California Urban Initiative, Urban Policy Brief*, 2004.

1. Include public health as an overarching goal in the Goods Movement Element and include performance standards to measure improvements.
2. Include public health as an overarching and priority and goal in the \$2.1 billion annual freight program included in the Environment and Public Works Committee.
3. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially in low income communities of color overburdened by air pollution and higher rates of uninsured residents.

**X. Public Participation Failures Must Be Remedied.**

Outreach and education to the public, especially on the onset on this process, was not sufficient to ensure that an adequate representation of members from impacted communities participate and give meaningful input. There were not enough public meetings or an adequate outreach strategy to ensure that there was more community involvement in this important process. Furthermore, a Goods Movement Steering Committee was established under SCAG to provide guidance and recommendations to SCAG's 2012 RTP/SCS, however, no formal process was established to receive formal recommendations from this group on the 2012 RTP/SCS.

We commend SCAG for completing the first Sustainable Community Strategy for the region and look forward to working with SCAG to ensure that it truly is a successful SCS by prioritizing health and equity.

If you have any questions about our recommendations, please do not hesitate to contact Patty Ochoa at 213-689-9170 or via email at [pochoa@psr-la.org](mailto:pochoa@psr-la.org).

Sincerely,

Patricia Ochoa, Environment and Health Coordinator  
Physicians for Social Responsibility- Los Angeles

Luis Cabrales, Deputy Director of Campaigns  
Coalition for Clean Air

Jocelyn Vivar Ramirez, M.P.H., Research and Policy Analyst  
East Yard Communities for Environmental Justice

Ruben Cantu, Program Director  
California Pan-Ethnic Health Network

Barbara Lott-Holland, Co-Chair of the Bus Riders Union  
Bus Riders Union

Maya Golden-Krasner, Staff Attorney  
Communities for a Better Environment

Sissy Trinh, Executive Director  
Southeast Asian Community Alliance

Isela Gracian, Associate Director  
East LA Community Corporation

Cynthia Babich, Founder and Executive Director  
Del Amo Action Committee

Penny Newman, Executive Director  
The Center for Community Action and Environmental Justice

Janette Robinson Flint, Executive Director  
Black Women for Wellness

Gisele Fong, PhD, Executive Director  
End Oil / Communities for Clean Ports

Jesse N. Marquez, Executive Director  
Coalition for a Safe Environment

Paulina Gonzalez, Executive Director  
Strategic Actions for a Just Economy

Gabrielle Weeks, Executive Director  
Long Beach Coalition For a Safe Environment

Drew Wood, Executive Director  
California Kids IAQ

Ricardo Pulido, Executive Director  
Community Dreams



**CITY OF SOUTH PASADENA**  
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February 1, 2012

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

**Re: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Review (PEIR)**

Dear Mr. Lieb:

On behalf of the City of South Pasadena, we ask you to please accept these comments on SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated Transportation Conformity Report and Draft Program Environmental Impact Review (PEIR).

**I. SCAG's welcome deletion of a surface SR-710 north extension should be accompanied by a land-use action to require State disposition of the hundreds of properties now surplus to the surface route.**

The City expresses appreciation to the Southern California Association of Governments (SCAG) for ending the SR-710 as a surface project in its 2008 RTP and maintaining that standing in the proposed plan and draft PEIR. SCAG should now recognize the California Legislature's intervening repeal of Section 100.4 of the Streets and Highways Code, which deprived the SR-710 corridor cities of their right to disapprove of a street-closing surface freeway, and the attendant legislative findings that the surface route will likely never be built. Under these premises, the RTP's land-use actions and strategies should include a requirement—to attain SB 375 criteria by creating affordable and other housing in transit corridors—that the hundreds of State-owned properties acquired for the surface route be released to private ownership. This overlooked measure affords a rapid means of creating such housing, in a relatively high-density environment, within the Gold Line transit corridor.

**II. SCAG should follow the State's designation of an unbuilt SR-710 project as an extension and not a gap closure.**

In the 1974-1998 EIS/EIR documents on the surface route, the project was characterized as the extension of the 710 north of Valley Boulevard. LA METRO adopted that terminology when the project changed from surface to tunnel and was made a subject of Measure R. Both the Legislature and the Bureau of State Audits continue in 2011 to refer to the unbuilt SR-710 project as an "extension." SCAG however continues, as it did in 2008, to refer to the project as a "gap closure," presumably on the premise that part of the 710 freeway

was completed south of the I-210 interchange. The 1976 judicial order that allowed the freeway component between I-210 and Del Mar Boulevard to be opened to traffic, however, treated this constructed freeway component as part of the I-210 project, as its opening was funded by an I-210 contract, and traffic was allowed not on the (then) route 7 freeway, but instead in the "Route 7 Corridor." In the words of the court, "only the southern portion of the Long Beach Freeway has been completed and it now terminates at Valley Boulevard. . . ." North of Valley to the I-210 interchange is described as the "uncompleted northerly portion." (*City of South Pasadena v. Volpe* (C.D. Cal. 1976) 418 F.Supp. 854, 858.)

Moreover, opening of that freeway portion was conditioned on the premise that opening the freeway segment "will have no effect on the decision as to the ultimate freeway location and will not foreclose reasonable alternatives to the proposed ultimate Route 7 Freeway." (418 F.Supp. at 864.)

To label the uncompleted 710 as a route "gap closure" ignores the reality that the freeway construction north of Del Mar was never accomplished in compliance with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA), and *use* of that portion was only allowed by the court as part of the 210 interchange and not to be used to justify completing a 710 freeway. The term "gap closure," designed to create a sense of inevitability or priority for this project over competing ones, must be removed.

### **III. The Plan and DEIR do not meet the legal requirements of the Clean Air Act, the National Environmental Protection Act or Title 23 of U.S. Code.**

SCAG is the federally designated metropolitan planning organization under U.S. Code Title 23 §134(d)(1) charged with creating the Metropolitan Transportation Plan (MTP). This plan (the RTP), and an affirmation of its conformity with the State Implementation Plan (SIP) for air quality, is required for the utilization of federal aid funding in the Los Angeles region. Regulations require that the plan be financially constrained, cover at least a 20-year horizon, and include all projects of "regional significance." The plan must be updated every 4 years and be responsibly modeled to determine that the proposed network meets air-quality conformity requirements. Based on our review, we do not believe this basic standard has been met.

#### **Test 1: Financial Constraint<sup>1</sup>**

Federal regulations require that the RTP be financially constrained and include specific financial strategies to ensure implementation of all phases of all projects included in the plan to achieve air-quality conformity.<sup>1</sup>

Projects for which the state or region cannot demonstrate adequate anticipated funding may not be included in the air-quality conformity model. To do so would result in incorrect and potentially unattainable air-quality forecasts, which could not rightfully be concluded to meet conformity requirements.

The extension of SR-710, incorrectly referenced as the "SR-710 Gap Closure" project, is included in the Draft RTP/SCS. The project is described as an 8-lane toll facility in a tunnel

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<sup>1</sup> 23 CFR Part 450.

and reported to cost \$5.64B projected for completion in 2030.<sup>2</sup> At present only \$780M has been secured. Tolling authority has been raised as a potential revenue source. However, a robust financial strategy to fully close the \$4.86B financial gap, as is required by federal standards, has yet to be produced.

The financial ability to implement the gap-closure project, as described and modeled in the Plan, is speculative at this point. Based on SCAG's own guidelines,<sup>3</sup> such projects are not eligible for inclusion in the constrained plan but may be maintained in a strategic plan.

The inclusion of speculative projects in the RTP does not meet the federal requirement for a fiscally constrained plan and results in the modeling of a questionable network, thus failing to meet federal or SCS requirements.

### **Test 2: Regional Emissions Analysis**

The emissions generated by the proposed network must be demonstrated to meet the emissions budgets prescribed by the State Implementation Plan (SIP).<sup>4</sup> Additionally, SB 375 requires SCAG to prepare a Sustainable Communities Strategy that achieves (and maintains) greenhouse gas emission reductions of 8% per capita by 2020 and 13% per capita by 2035. A primary goal of SB 375 is to significantly reduce Vehicle Miles Traveled (VMT) as a tool for greenhouse gas emission reductions.

Questionable assumptions are made regarding the air-quality benefits and VMT reductions that may be achieved by a network, including the SR-710 highway expansion. The assumed results include congestion relief, reduced VMT, and lower greenhouse gas emissions. These assumptions are not borne out by recent research<sup>5</sup> and comparable peer regions. Research in California has concluded that a 10% increase in highway capacity leads to a 9% increase in VMT.<sup>6</sup> A recent and extensive study utilizing Federal Highway Administration (FHWA) data also concluded that new or expanded interstate facilities correlate with VMT increases nearly on a one for one percentage basis and that the increase is above and beyond VMT that shifts from alternative routes or other modes.<sup>7</sup> The new facility will attract additional drivers, additional trips, and convert some transit trips to drive trips, eliminating most assumed air-quality benefits.

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<sup>2</sup> SCAG Draft 2112-2035 Regional Transportation Plan, 163.

<sup>3</sup> SCAG 2012-2035 RTP/SCS Draft PEIR, 2-4.

<sup>4</sup> 42 USC § 7506.

<sup>5</sup> Relevant studies include:

- Fulton, Lewis et al. "A Statistical Analysis of Induced Travel Effects in the U.S. Mid-Atlantic Region." *Journal of Transportation Statistics*, Volume 3, No. 1, April 2000.
- Lee, Douglass B., Jr., et al. "Induced Traffic and Induced Demand." *Transportation Research Record*, 1659, 1999, 68-78.
- Johnston, Robert A. et al. "Applying an Integrated Model to the Evaluation of Travel Demand Management Policies in the Sacramento Region." Mineta Transportation Institute, San Jose State University, September 2001.
- Cervero, Robert. "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis." *Journal of the American Planning Association*, Volume 69, No. 2, June 2003, 145-163.

<sup>6</sup> Hansen, Mark. "Do New Highways Generate Traffic?" *Access*, No. 7, Fall 1995, 16-22.

<sup>7</sup> Duranton, Gilles, and Turner, Matthew A. "The Fundamental Law of Road Congestion: Evidence from US Cities." *American Economic Review*, Volume 101, No. 6, October 2011, 2616-52.

A comparable case in the Metropolitan Washington Council of Governments (MWCOC) region had just such a result with the 1991 widening of I-270. This project was included in the regional network and analyzed in the regional air-quality model, which assumed the added capacity would reduce congestion, improve mobility and provide air-quality benefits. It further assumed that the majority of trips on the new facility would be diverted from the smaller streets on the network and therefore assumed no change in VMT projections and no reduction in transit mode share. Within just 8 years of project completion, however, congestion levels had returned to previous levels—in some segments 10 years earlier than the model predicted. Dramatic residential development followed the facility expansion, despite regional modeling assumptions that local land-use plans could control such growth. The corridor paralleled the heavy rail transit “red line,” and despite increases in population along the transit corridor, transit ridership dropped by more than 6% during the first three years after the additional lanes opened. The added cars and early congestion meant air-quality impacts were worse than the model had predicted. In 2001, 10 years after the widening opened, for the first time ever, the regional transportation plan for the Washington Region failed to meet federal Clean Air requirements and all planning had to be put on hold.<sup>8</sup>

Given this research and evidence, the plan has not demonstrated that the regional emissions analysis is reasonable and based on justified and demonstrated assumptions and cannot be concluded to meet air quality conformance standards.

**IV. By erroneously specifying only one SR-710 extension alternative—a straight line tunnel—the Plan and DEIR threaten program-level conformity and unlawfully prejudice future project-level environmental analyses.**

The draft PEIR should assess impacts of the proposed system as a whole. Although it does not isolate the impacts of individual projects nor differentiate their unique impacts or benefits to the system as a whole, regulations require consistency between the project described and analyzed at the program level and analysis at the project level.<sup>ii</sup>

A project design concept and scope must not have changed significantly from that included in the metropolitan transportation plan for which the determination of conformity was made, and projects must be described in sufficient detail to determine emissions.<sup>9</sup>

Once included in an approved plan, the lead agencies may include, by reference, the program level PEIR purpose and need in their project-level environmental clearance documents and may further use the PEIR as the basis for their regional and cumulative impacts analysis.

NEPA and CEQA regulations prescribe a rigorous and transparent process that explores and objectively evaluates a number of project alternatives capable of meeting the project purpose and need. This process for the SR-710 extension project remains in its early stages, and an agency-preferred alternative has not yet been determined or stated, as several viable alternatives are still under consideration. The proposed Plan includes the toll-tunnel alternative

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<sup>8</sup> “Clean Air Issues Put Transportation Planning Process on Hold.” *The Region*, National Capital Region Transportation Planning Board, Volume 41, 2002, 10-15.

<sup>9</sup> 42 USC §7506.

in the constrained plan while the transit and “tunnel alternative” options remain in the strategic plan.

According to NEPA, “interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.”<sup>10</sup>

Given the requirement for program-level conformity consistent with project-level analysis, inclusion of the SR-710 extension as portrayed as a straight-line tunnel route is not appropriate. LA METRO has yet to propose a specific tunnel alignment, or for that matter any preferred project in the corridor. Even if LA METRO does advance a tunnel, the straight-line route is likely not to emerge as the most favorable of the tunnel alternatives, and indeed, LA METRO's environmental review may end up rejecting the tunnel option entirely. A tunnel option that avoids the steep grade rising into Pasadena and that avoids the Raymond Fault could emerge as more favorable both environmentally and economically, and earn less community opposition, than the direct route. That routing should produce different traffic patterns and modeling outcomes than a project on the assumed direct route.

Therefore, SCAG's inclusion of a single alternative to the SR-710 project in its RTP and draft PEIR would prejudice the environmental review process. This circumstance additionally establishes why a specific SR-710 project cannot be included in the constrained plan at this time.

**V. Even though the proposed RTP and its shift of truck traffic to the East-West Corridor vitiates the asserted need for an SR-710 tunnel, the plan and draft PEIR should emphasize elimination of non-local truck traffic in preference to a direct rail loading at the ports.**

In promoting the SR-710 tunnel within the last decade, officials have emphasized the need for truck-borne freight to move out of the LA Basin, claiming that such freight haulers (as opposed to commuters or drivers of light trucks) would find the projected tolls acceptable. In light of the draft RTP's emphasis of moving heavy truck traffic originating in the San Pedro Bay ports *not* along the 710 corridor north of I-10, but instead by an East-West Corridor to the Inland Empire, the plan and draft EIR cannot consistently maintain that an SR-710 freeway extension deserves priority or even inclusion.

As beneficial as it may be, in comparison to existing conditions, to shift truck-borne freight traffic off the northern portions of I-710, the RTP and draft PEIR must consider and adopt an even more vigorous approach that is necessary to meet SB 375's mandate of greenhouse gas reduction. Specifically, the plan and PEIR must assess and include the benefits of loading containers onto rail cars directly off the ships at dockside, thereby eliminating even further the case for new highway construction to relieve truck-induced traffic congestion. As pointed out in a recent *The Economist* essay, to maintain their standing in the face of a widened and deepened Panama Canal, “California’s ports must compete on speed. . . .” They cannot do so as long as the RTP and draft PEIR continue to “clog up stretches of the I-710 freeway. . . .” (“California Ports: The Fickle Asian Container.” *The Economist* (Jan. 28, Feb. 3, 2012, 30.)

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<sup>10</sup> 40 CFR §1506.

## Conclusion

The City of South Pasadena requests that the SCAG RTP and PEIR remove the SR-710 north extension. With its inclusion, the Plan has not demonstrated that it can meet two of the four required tests of conformity—sufficient financial resources for the project have not been demonstrated, and assumptions regarding regional emissions are flawed. The reported impacts of the planned network are based on suspect assumptions. Inclusion of the project at this time will bias future project-level NEPA and CEQA review if and when an SR-710 tunnel alignment becomes LA METRO's preferred alternative. Finally, while the circulating draft RTP and PEIR vitiate the need for any SR-710 extension that will produce tolls and relieve congestion, SCAG must discard its emphasis on accommodating any truck traffic from the ports and redraw its plan and assessments to anticipate the direct ship-to-rail transport that enables air-quality conformity and successful port competition.

Sincerely,



Michael A. Cacciotti  
Mayor



Philip C. Putnam  
Mayor Pro Tem



Robert S. Joe  
Councilmember



Marina Khubesrian, M.D.  
Councilmember



Richard D. Schneider, M.D.  
Councilmember

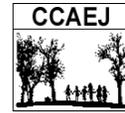
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<sup>i</sup> 23 CFR § 450.322 (b) (11) [the Metropolitan Transportation Plan shall] “Include a financial plan that demonstrates the consistency of proposed transportation investments with already available and projected sources of revenue. The financial plan shall compare the estimated revenue from existing and proposed funding sources that can reasonably be expected to be available for transportation uses, and the estimated costs of constructing, maintaining and operating the total (existing plus planned) transportation system over the period of the plan. The estimated revenue by existing revenue source (local, State, and Federal and private) available for transportation projects shall be determined and any shortfalls identified. Proposed new revenues and/or revenue sources to cover shortfalls shall be identified, including strategies for ensuring their availability for proposed investments. Existing and proposed revenues shall cover all forecasted capital, operating, and maintenance costs. All cost and revenue projections shall be based on the data reflecting the existing situation and historical trends. For nonattainment and maintenance areas, the financial plan shall address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance.” (emphasis added)

<sup>ii</sup> 42 USC §7506 Limitations on certain Federal assistance -- Clean Air Act Section 176(c)

Sec. 7506(c) (2) (C) a transportation project may be adopted or approved by a metropolitan planning organization... only if it meets... the following requirements--

- (i) such a project comes from a conforming plan and program;
- (ii) the design concept and scope of such project have not changed significantly since the conformity finding regarding the plan and program from which the project derived; and
- (iii) the design concept and scope of such project at the time of the conformity determination for the program was adequate to determine emissions.



BLACK WOMEN FOR WELLNESS



February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

Dear President O'Connor and Southern California Association of Governments Regional Council Members:

The undersigned appreciate the dedication and efforts of the staff at Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the recommendations in the plan that moves the region towards an improved transportation system while improving public health and air quality.

The 2012 RTP/SCS includes many smart growth strategies that will increase mobility, public health and environmental health standards. As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to:

- *Increase investment in active transportation strategies.*
- *Acknowledge that a regional zero emission freight system is needed in the region.*
- *Discuss gentrification issues as part of Environmental Justice.*
- *Monitor premature mortality due to PM2.5.*

Though SCAG has shown commitment to improving the region's *mobility, economy and sustainability* by including public health analysis in transportation planning policies, more can still be done to improve air quality, increase equity and improve our goods movement system.

The SCAG region faces immense public health and environmental challenges, and the RTP/SCS must be enhanced to address these issues. The SCAG region continues to have the worst air quality in the nation and contains "14 non-attainment and maintenance areas in four air

basins”<sup>1</sup>. Additionally, SCAG recognizes that 25% to 27% of the population “within the freeway adjacent areas are projected to see increases in their emission exposures to CO and PM”<sup>2</sup>. According to Figure 46 in the Environmental Justice Appendix, close to 60% of the population residing within 500 feet from the buffer area are Hispanic and in Quintile 1 (The Lowest Income Household). The issues of air pollution are even more acute in the SCAG region given the rampant prevalence of diesel equipment used in the freight industry. Residents in close proximity to highways, particularly those with high levels of diesel trucks, will experience increased rates of cardiovascular and respiratory disease, premature mortality, increased lung cancer incidence, decreased life expectancy, reproductive health problems, and increased asthma symptoms<sup>3 4 5 6</sup>. While we recognize that the goods movement sector is an economic driving force in the region, we cannot sit by idly and allow the immense damage to the health of our most vulnerable communities persist.

Given these challenges, we recommend several improvements that must be made to improve the RTP/SCS.

### **I. The RTP/SCS Must Do More To Promote Public Health Protections, Active Transportation and Equity.**

The RTP/SCS is the blueprint for years to come. As such, it must be designed to promote public health through choosing better transportation alternatives and making sure we spread the benefits of these investments to all residents in the region, regardless of race, income, or other social status. Moreover, we must make sure we minimize exposure to environmental harms.

### **II. The RTP/SCS Must Invest and Include Healthy and Equitable Policies.**

Implementing this recommendation requires addressing the following critical public health issues:

#### *A. Mitigate PM and CO exposure in high quality transit areas.*

The 2012 RTP/SCS will redirect 51% of new housing near High Quality Transit Areas (HQTA) providing an opportunity for healthy communities. Redirecting the growth of new housing closer to busy roads and freeways could violate the California Air Resources Board’s recommended 500 feet freeway buffer, and potentially increase CO and PM exposure and noise impacts. SCAG has acknowledged that 25% to 27% households living within freeway adjacent areas will see increases in their emission exposure to CO and PM. In addition to monitoring these areas for PM and CO, we recommend that SCAG also project and map out the areas that may be impacted as a result of the redirected growth up to the year 2035. We also recommend for SCAG to include current mitigation strategies in the EJ Toolkit and work with the local communities, health advocates and stakeholders to continue developing policies that will be included as part of the mitigation strategies for HQTA.

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<sup>1</sup> Pg. 18, VISON APPENDIX

<sup>2</sup> Pg. 122, EJ APPENDIX

<sup>3</sup> California Air Resource Board. Air Quality and Land Use Handbook: A Community Health Perspective. 2005. <http://www.arb.ca.gov/ch/landuse.htm>.

<sup>4</sup> Brunekreef B, Janssen NA, Hartog J. 1997. Air Pollution from truck traffic and lung function in children living near motorways. *Epidemiology* 8:298-303.

<sup>5</sup> VennAJ, Lewis S, Cooper M, Hubbard R, Britton J. 2001. Living near a main roadway the risk of wheezing illness in children. *Amer J Resp and Critical Care Med* 164(12):2177-80.

<sup>6</sup> Various studies:

Gauderman, W. James, Ph.D, et al., *N Engl J Med* 2004; 351:1057-1067.

Jun Wu et al., *Environmental Health Perspectives* 2009; 117: 1773-9.

McConnell, Rob MD et. al., *Lancet* 2002; 359:386-391.

Arden, Pope C III, PhD et al., *JAMA* 2002; 287; 1132–1141.

*B. Mitigate highway noise areas in communities of concern.*

Highway noise areas are also disproportionate to environmental justice communities with 22% of the affected population residing within roadway noise areas and 14% of the households below the poverty line<sup>7</sup>. Noise impacts have been associated with hearing impairment, hypertension and ischemic heart disease annoyance and sleep disturbance<sup>8</sup>. Further noise impact mitigation studies should be utilized in future 2012 RTP/SCS plans.

*C. Monitor and develop tools to avoid gentrification and displacement in TODs.*

SCAG's current analysis of 125 HQTAs around rail stations found that the demographics of HQTAs/TOCs are changing. Poverty rates are declining in these areas when compared to the rest of the region<sup>9</sup>. These results show that displacement and gentrification may be occurring in these areas. As such, gentrification should be acknowledged and policies need to be put in place to avoid this from happening. In addition to tracking the 125 rail stations, SCAG should:

1. Track commute time by race and income in Communities of Concern (COCs) and compare it to the region.
2. Set a baseline for jobs-housing fit by taking a "snap shot" of 4-to-5-mile buffer zone around major job centers, and compare the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good jobs-housing fit. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas.
3. Use the Compass Blueprint Program to advance a policy toolkit that highlights and recommends anti-displacement and anti-gentrification policy options in TOD areas, as an eligible subject for a Compass Blueprint grant proposal.

**III. The RTP/SCS Must Ensure That the Region has a Complete Network of Transportation Strategies that Connect Travelers to a Wider Range of Transportation Options.**

This entails implementation of the following recommendations:

*A. Increase investment in active transportation.*

In order to achieve true walkable and healthy communities we recommend for SCAG to increase its investments in Active Transportation strategies beyond the \$6 billion currently recommended.

*B. Increase investment in public transportation.*

Prioritize investment in bus rapid transit and taking existing infrastructure to include bus-only lanes instead of expanding highway to accommodate for additional capacity.

*C. Access, mobility and safety.*

In order to better connect the region that depends on non-motorized modes of transportation, first-mile/last-mile strategies should also include close-the-gap strategies that integrate active modes of transportation to allow for accessibility to employment and services. To better do this, SCAG should identify geographic areas with high concentrations of communities of concern and track their transportation access, cost, mobility, rent, and gentrification and displacement patterns

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<sup>7</sup> Pg. 127, EJ APPENDIX

<sup>8</sup> Passchier-Vermeer, W. and Paschier F., W. Noise Exposure and Public Health. *Environmental Health Perspectives*, *Environmental Health Perspectives* 108(1):123-131, March 2000.

<sup>9</sup> Page 93, EJ APPENDIX

(using the seven indicators to track early signs of displacement or gentrification)<sup>10</sup>. The data can be used in future RTP/SCS and determine where close-the-gap strategies would best serve the region and address any adverse impacts that transportation projects can cause to communities of concern. SCAG should also use the data to determine what communities are underserved by transportation projects and connect those underserved communities to high opportunity areas.

#### **IV. SCAG Must Support Federal Policies That Benefit Active Transportation.**

Given the current state of the federal transportation bill and efforts to strip dedicated funding from MAP-21 in the Senate and the House American Energy and Infrastructure Jobs Act in the House, we are concerned that expected federal revenues for bicycle and pedestrian enhancements may not materialize.

To this end we request that SCAG fully support an amendment offered by Senator Lautenberg in the EPW Committee to ensure that total funds available in the “additional activities” reserve fund in MAP-21 for Recreational Trails, Safe Routes to School, and bicycle and pedestrian investments are equal to those currently in SAFETEA-LU. Additionally, this amendment would ensure that regions within states are able to have direct and first access to these funds so that cities throughout the SCAG region are able to directly apply for and receive funding for important bicycle and pedestrian projects. As the Senate bill progresses to the floor there will be opportunities for Senator Boxer to incorporate these provisions into the final bill and it is important for SCAG to make clear it supports them.

#### **V. The Freight Strategies in the RTP/SCS Must Be Improved.**

We remain deeply concerned about the freight elements of the RTP/SCS. While the plan acknowledges the need to move to zero emissions technologies, it provides little substance on how it will actually happen. The RTP must be more rigorous. To support this, we suggest the following improvements to the freight elements of the plan.

##### *A. The RTP/SCS must actually require creation of a zero-emission truck and freight goods movement for the region.*

Several issues must be addressed in the 2012 RTP/SCS before it is adopted with regard to how freight is moved through the year 2035. Goods movement strategies must ensure that the South Coast Air Basin meet federal air quality standards set forth in the Clean Air Act. Currently, the plan provides little detail on this issue, including how black box reductions will be achieved from the substantial portion of emissions from freight. While we agree with the many experts who “question the long-term viability of continued reliance on fossil fuels,” the RTP/SCS lacks details on how best to actually achieve this goal<sup>11</sup>. The “uncertainty of a petroleum-based future” needs to be at the forefront of the 2012 RTP/SCS where any expansion plans that increase a petroleum-based roadway system and raise Vehicle Miles Travel (VMT) must be curtailed<sup>12</sup>. The RTP/SCS needs to do more than just put words on paper about the need for this system. Future projects must be required to incorporate these technologies or they should not be built.

Financing these cleaner technologies is an important consideration for SCAG. Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero

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<sup>10</sup> Pg. 93, EJ APPENDIX

<sup>11</sup> Pg. 29, DRAFT 2012 RTP/SCS

<sup>12</sup> Pg. 29, DRAFT 2012 RTP/SCS

emission freight and truck strategies should be a central component of the strategy. For these reasons, we recommend that SCAG consider including the following funding strategies:

1. Develop a clear assessment of various financing options including various models of public-private partnerships that could make zero-emission technology options possible. Recommend a \$30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports<sup>13</sup>.
2. Use currently available clean truck technology and incentivize it through funding and or by way of preferential access lanes at terminals.
3. Reinststitute the diesel truck fee to incentivize clean, alternative fuel trucks.
4. Improve fee structure to give preference to clean alternative fuel trucks.

*B. The RTP/SCS must implement near-term solutions to reduce greenhouse gas emissions from freight.*

We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the 2012 RTP/SCS in other areas. In particular, CO<sub>2</sub> emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035. Even more dramatically, CO<sub>2</sub> emissions from rail would increase at least 50% by 2023 and at least 123% by 2035<sup>14</sup>.

Given that “This RTP Goods Movement Environmental Strategy was developed to address community concerns, federal attainment requirements, and *climate change issues*,” it is problematic that near-term solutions are not more fully articulated<sup>15</sup>. Near-term strategies to clean up goods movement must be fully integrated into the 2012 RTP/SCS. We would like to work with you before the final version of the 2012 RTP/SCS to resolve this deficiency. Indeed as stated “For trucks, an aggressive program to bring more currently available, clean fuel trucks and hybrid trucks into service represents the best near-term strategy”<sup>16</sup>. Yet no such program is identified for either trucks or rail.

The ports of Los Angeles and Long Beach have left a gaping hole in clean air planning by not establishing targets and reduction plans for greenhouse gases (GHGs). SCAG and the 2012 RTP/SCS should demand that the Clean Air Action Plan be augmented with GHG reduction plans. Both ports have in the past promised to have such plans but neither has released one<sup>17</sup>. Such plans should complement and accelerate SCAG’s vision for increased efficiencies and the deployment of cleaner technologies.

While we commend the steps to evaluate and seek funding for longer-term zero and near-zero emissions technologies, the severity of the pollution and congestion from freight activities merits additional attention in the near-term. And while the 2012 RTP/SCS rightly considers heavy-duty trucks and rail emissions, it would be worth devising a set of strategies that account for the differences among local freight service and that of port origin/destination. Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector’s 2<sup>nd</sup> largest emitter of NO<sub>x</sub><sup>18</sup>.

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<sup>13</sup> Haveman, Jon, and Thornber, Christopher. Container Fees and Commercial Benefits of Improved Waterborne Goods Movement Infrastructure in California. *Beacon Economics*. August 2007. [http://www.coalitionforcleanair.org/images/stories/Haveman\\_Report\\_Final\\_Aug2007.pdf](http://www.coalitionforcleanair.org/images/stories/Haveman_Report_Final_Aug2007.pdf)

<sup>14</sup> Pg. 33, GOODS MOVEMENT APPENDIX

<sup>15</sup> pg. 33, GOODS MOVEMENT APPENDIX, emphasis added

<sup>16</sup> Pg. 39, GOODS MOVEMENT APPENDIX

<sup>17</sup> POLB has initiated a GHG mitigation fund to attempt to offset some of its increased emissions

<sup>18</sup> Pg. 32, Figure 8, GOODS MOVEMENT APPENDIX

In the section On-Dock/Near-Dock Rail Capacity Enhancements, the 2012 RTP/SCS appropriately expresses preference for on-dock rail “By allowing more on-dock rail, truck traffic between the San Pedro Bay Ports and distant rail yards can be reduced. Use of on-dock rail eliminates truck vehicle miles of travel (VMT) and associated emissions”<sup>19</sup>. SCAG should demand a sequencing of projects that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost.

#### **VI. The RTP/SCS Must Remove the East-West Corridor Route Project.**

Recommending to build an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the region and particularly for local communities of concern (COC). Additionally, if the east-west corridor project goes forward, an increase in truck traffic per day (from 58,000-78,000) could increase noise pollution and air pollution<sup>20</sup>.

*The Goods Movement Environmental Strategy and Action Plan* schedules full operational deployment of zero and near zero-emissions for trucks in 2018<sup>21</sup>. This plan prematurely predicts that the infrastructure, market and technology will be available for use without taking into consideration funding shortfalls and without putting in place earlier interventions. In the meantime, east-west corridor adjacent communities will be adversely impacted by displacement, or over-burden suffering from adverse health and quality of life impacts associated with the construction of the project and the trucks that will eventually utilize the route. SCAG must go beyond investing in research and guarantee that all lanes classified as zero-emission truck-only lanes only be used by zero-emission trucks.

Before considering adding this project to the RTP/SCS, SCAG must address the following:

1. Provide health and community demographic data on impact on the east-west corridor project. Specifically data that shows potential neighborhoods which may be displaced, noise and air quality impacts on surrounding communities, race, class, socio-economic status of the communities that will be impacted and how many of them are COCs.
2. Develop an analysis of the local roadway systems that trucks will utilize once they have reached their destination.
3. Develop an analysis of the total number of on-ramps and off-ramps planned for the east-west corridor, an approximation of where they will be (i.e. which streets will be used for entering and exiting the east-west corridor), and the configuration/style of each on-ramp and off-ramp.
4. Define the performance measures that would outline how success would be measured for the proposed east-west corridor, including anticipated truck traffic counts.
5. Set outreach and communication guidelines that allow for greater public participation from the general public and pertinent partners and timely feedback to questions asked.
6. Include an outreach and engagement plan that includes impacted COCs, stakeholders and health advocates, as part of the Goods Movement and Environmental Strategy Action Plan.

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<sup>19</sup> Pg. 27, GOODS MOVEMENT APPENDIX

<sup>20</sup> Pg. 20, GOODS MOVEMENT APPENDIX

<sup>21</sup> Pg. 21, GOODS MOVEMENT APPENDIX

## **VII. SCAG Must Support National Efforts to Create a Strategic Plan for the Freight System.**

Given the limitations with funding our goods movement and particularly the zero emissions and near zero emissions freight strategy, we encourage SCAG to include language that clarifies the current federal funding constraints and alter the 2012 RTP/SCS to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100. As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding and the establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Senate and House.

SCAG should actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program, and support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written. We support the addition of this language as offered by Senator Lautenberg and the inclusion of Senator Lautenberg's FREIGHT Act of 2011 (Focusing Resources, Economic Investment, and Guidance to Help Transportation) in the Commerce Committee bill S. 1950 the Commercial Motor Vehicle Safety Enhancement Act of 2011 which would create a national strategic plan for the freight system, a competitive grant program, and establish clear goals and objectives including reducing emissions, improving safety and efficiency, enhancing economic competitiveness, use of innovative technologies, and improving the state of repair of existing infrastructure.

## **VIII. The RTP/SCS Must Focus Attention on Cleaning Up Existing Freight Corridors, Not Just the Proposed New Projects.**

While we welcome zero emission technology by the year 2035, more short term gains must be implemented. SCAG should incorporate what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology). Additionally, SCAG member governments must include a zero emission corridor from the ports to the ICTF or along Alameda Street and strengthen specific requirements in new projects beyond "bare minimum" standards used in current projects.

## **IX. The RTP/SCS Must Include Public Health as an Overarching Goal of the Goods Movement Element.**

More and more research is associating air pollution with asthma prevalence, poor lung function and a series of other health impacts. The California Air Resources Board states that the "prevalence of asthma in the U.S. has increased by more than 75% since 1980"<sup>22</sup>. Furthermore results from the USC Children's Health Study, a ten year study, show that children in Southern California's more polluted communities "suffer reduced growth of lung function, asthma exacerbations, more school absences, and new onset asthma"<sup>23</sup>. The public health evidence is growing. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, and not just the region's economic growth. SCAG must:

<sup>22</sup> California Air Resources Board. Asthma and Air Pollution. <http://www.arb.ca.gov/research/asthma/asthma.htm>, May 25, 2010.

<sup>23</sup> Hricko, Andrea M. Road to An Unhealthy Future for Southern California's Children. *University of Southern California Urban Initiative, Urban Policy Brief*, 2004.

1. Include public health as an overarching goal in the Goods Movement Element and include performance standards to measure improvements.
2. Include public health as an overarching and priority and goal in the \$2.1 billion annual freight program included in the Environment and Public Works Committee.
3. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially in low income communities of color overburdened by air pollution and higher rates of uninsured residents.

**X. Public Participation Failures Must Be Remedied.**

Outreach and education to the public, especially on the onset on this process, was not sufficient to ensure that an adequate representation of members from impacted communities participate and give meaningful input. There were not enough public meetings or an adequate outreach strategy to ensure that there was more community involvement in this important process. Furthermore, a Goods Movement Steering Committee was established under SCAG to provide guidance and recommendations to SCAG's 2012 RTP/SCS, however, no formal process was established to receive formal recommendations from this group on the 2012 RTP/SCS.

We commend SCAG for completing the first Sustainable Community Strategy for the region and look forward to working with SCAG to ensure that it truly is a successful SCS by prioritizing health and equity.

If you have any questions about our recommendations, please do not hesitate to contact Patty Ochoa at 213-689-9170 or via email at [pochoa@psr-la.org](mailto:pochoa@psr-la.org).

Sincerely,

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Physicians for Social Responsibility- Los Angeles

Luis Cabrales, Deputy Director of Campaigns  
Coalition for Clean Air

Jocelyn Vivar Ramirez, M.P.H., Research and Policy Analyst  
East Yard Communities for Environmental Justice

Ruben Cantu, Program Director  
California Pan-Ethnic Health Network

Barbara Lott-Holland, Co-Chair of the Bus Riders Union  
Bus Riders Union

Maya Golden-Krasner, Staff Attorney  
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Sissy Trinh, Executive Director  
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Isela Gracian, Associate Director  
East LA Community Corporation

Cynthia Babich, Founder and Executive Director  
Del Amo Action Committee

Penny Newman, Executive Director  
The Center for Community Action and Environmental Justice

Janette Robinson Flint, Executive Director  
Black Women for Wellness

Gisele Fong, PhD, Executive Director  
End Oil / Communities for Clean Ports

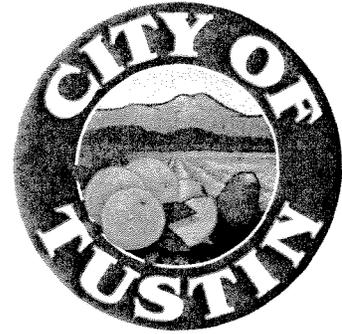
Jesse N. Marquez, Executive Director  
Coalition for a Safe Environment

Paulina Gonzalez, Executive Director  
Strategic Actions for a Just Economy

Gabrielle Weeks, Executive Director  
Long Beach Coalition For a Safe Environment

Drew Wood, Executive Director  
California Kids IAQ

Ricardo Pulido, Executive Director  
Community Dreams



February 8, 2012

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

**SUBJECT: REVIEW DRAFT 2012 SCAG RTP/SCS AND DRAFT PEIR**

Dear Ms. Lin:

Thank you for the opportunity to provide comments on the Draft 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (DPEIR) for the 2012 SCAG RTP/SCS.

The City of Tustin has prepared the following comments for your consideration at this time:

- Most of the proposed mitigation measures go above and beyond the strategies of the Orange County SCS and requirements of the RTP and Senate Bill 375. For example, Mitigation Measure "Greenhouse Gas Emissions 5" states that "SCAG shall assist ARB and air districts in efforts to implement the AB 32 Scoping Plan." Implementation of the AB 32 Scoping Plan goes above and beyond the scope of SB 375 and the RTP. Therefore, this mitigation measure, and others like it that exceed the scope of the RTP and SB 375, should be removed from the PEIR.
- Proposed mitigation measures are already required by State and Federal law or are regulated by other agencies such as the South Coast Air Quality Management District, California Department of Housing and Community Development, California Department of Fish and Game, and the Regional Water Quality Control Boards should be removed from the PEIR.
- Many of the proposed mitigation measures, including "Land Use 3," "Land Use 10" and "Land Use 42" are contrary to local control. Mitigation Measure "Land Use 10" is one of the most compelling examples. It reads "Local jurisdictions can and should provide for new housing consistent with the Regional Housing Needs Assessment (RHNA) to accommodate their share of the forecasted regional growth." This mitigation measure is problematic and should be removed or revised because State Law and the RHNA do not require local jurisdictions to ensure that housing units are actually built.
- Many of the proposed mitigation measures impose taxes or fees that are financially infeasible for local agencies to implement or impose an undue burden on the building industry. For example, Mitigation Measure "Transportation, Traffic and Security 60" states the following: "Transit and Multimodal Impact Fees: Local jurisdictions can and

should assess transit and multimodal impact fees on new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations.” A second example is Mitigation Measure “Transportation, Traffic and Security 37” which reads “Local jurisdictions and transit agencies can and should provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers.” Requiring these types of fees and incentives will increase the cost of development and negatively impact the local economy. Therefore, all such measures should be removed from the PEIR.

- The use of the words “can and should” throughout the PEIR and the Draft RTP/SCS implies that the proposed mitigation measures are feasible, and that local jurisdictions are expected to implement them. The following statement from page 1-7 of the Introduction makes this intent clear: “Local governments routinely implement the types of mitigation measures identified in this Draft PEIR during project design, CEQA review, and/or project construction. This Draft PEIR has made a preliminary determination that these mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them.” There is no analysis in the Draft RTP/SCS to demonstrate that every local jurisdiction within the SCAG region has the ability, staffing, and financial resources to implement all of the mitigation measures. SCAG should replace the words “can and should” with “should” in all of the mitigation measures in the PEIR and throughout the SCS Chapter of the Draft RTP/SCS. This change in wording would be consistent with SCAG staff’s representation at the Orange County Council of Governments January 26, 2012, Board meeting that the mitigation measures are intended to be a “tool box” of options.
- The Draft RTP/SCS assumes that the transportation projects outlined in the document have the potential to induce growth in certain parts of the region. This concept is evidenced by Mitigation Measure “Biological Resources and Open Space 47” which reads “Project sponsors can and should ensure that transportation systems proposed in the 2012-2035 RTP/SCS avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from growth associated with transportation projects and improvements.” This measure is not consistent with the OCSCS and the approved growth projections and patterns embodied within the Orange County Projections 2010 Modified. Therefore, all references to induced growth should be removed from the PEIR.
- It is stated on page 80 of the Draft RTP/SCS that “the RTP has the ability to affect the distribution of that growth.” This statement appears to contradict SCAG’s agreement pursuant to the Memorandum of Understanding with the Orange County Council of Governments (OCCOG) that the strategies and local land use policies of the Orange County SCS will be respected. The RTP/SCS should acknowledge that the local land use plans in Orange County will not be changed through the RPT/SCS.
- Many of the mitigation measures in the Draft PEIR are draconian and need to be removed and/or revised. One prime example is Mitigation Measure “Land Use 85.” It reads in part “Local jurisdictions can and should reduce heat gain from pavement and other hardscaping including: Reduce street rights-of-way and pavement widths to pre-World War II widths (typically 22 to 34 feet for local streets, and 30 to 35 feet for collector streets, curb to curb)...” Although reduced street widths may be appropriate in some

cases and have been implemented in many jurisdictions, it is inappropriate and counterproductive to require reduced street widths as a mitigation measure in the PEIR. Reduced street widths, for example, generally do not provide space for on-street parking which may result in greater, additional paved areas provided in separate parking lots.

- The Draft RTP/SCS suggests that \$127.2 billion of an approximately \$219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a \$0.15 gas tax increase between 2017 and 2024. After that, the report assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.05 per mile, beginning in 2025, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee.

The City of Tustin cannot support an increase in fees, including the introduction of a mileage-based user fee, until further economic analysis is completed and until and unless there can be an explanation of the return to source principles which will be used for the distribution of funds collected thereunder. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on a process for recognizing and rewarding areas which commit additional revenues.

- The Draft RTP/SCS proposes a number of investments that affect Orange County and go beyond the Long-Range Transportation Plan (LRTP). The City will only consider additional investments after revenues are identified to account for these commitments. The regional strategies identified by SCAG do not have clear funding mechanisms, and it must be made clear that their inclusion in the RTP/SCS does not constitute a commitment to fund and/or implement the improvements.
- The Sustainable Communities Strategy (“SCS”) is recognized as a key portion of the 2012 RTP/SCS, and serves to meet responsibilities associated with SB 375. It is clear the SCS “Goals and Benefits” involve significant local jurisdiction participation and efforts. It is critical for the RTP/SCS to recognize the need to sufficiently fund local agency efforts to assure successful outcomes.
- Tables 4.3 - 4.7 of the RTP/SCS identify “Action/Strategy” efforts related to the SCS, with local jurisdictions being identified as responsible parties for many of the tasks. Without proper funding for local jurisdiction efforts we believe the effectiveness of the “Action/Strategy” measures will be compromised.
- In general, current policies and goals of the RTP/SCS identify projects and funding necessary to successfully implement elements of the RTP/SCS. There are also RTP/SCS goals which essentially require development “from the ground up” at the local level. We agree the most efficient and effective efforts toward meeting these RTP/SCS goals will begin with the local jurisdictions.

There needs to be sufficient levels of funding (which do not appear to be addressed in the current RTP/SCS draft) to allow local jurisdictions to adequately initiate these specialized efforts. From a practical perspective, this funding would be expected to yield some of the most immediate and timely results in meeting RTP/SCS goals. They would consider measures which could include, but not be limited to:

- Programs for improved use of public transit
  - Responsiveness to demographic changes
  - Improved management of existing transportation infrastructure and roadways
  - Employer-based Transportation Management Plans
  - Trip-reduction efforts including promotion of telecommuting
  - Carpool/transit parking near transportation corridors
  - Better “place marking” which includes an increase of walkable environments
  - Support of bicycle programs including bicycle storage and bike lanes
  - Bridging gaps between mass transit options and shipping and service centers
  - Programs for new construction and reconstruction of non-motorized transportation paths
- Measures to reduce vehicle miles traveled will involve local jurisdictions and employers to implement many strategies which include but are not limited to measures such as:
    - Increasing rideshare and work-at-home
    - Investing in non-motorized transportation facilities
    - Developing appropriate land use strategies
    - Encouraging universal employee transit access passes
    - Synchronizing traffic signals
    - Using LED technology for new traffic signals and street lights
    - Allocating convenient parking areas, loading areas and larger parking spaces for vans and HOV
    - Creating ride-sharing programs and provide parking near public transportation
    - Enhancing safety and cleanliness at transit stations
    - Providing shuttles to transit
    - Providing incentives, education and publicity to encourage use of transit

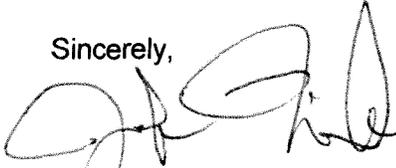
It will be necessary to provide funding to local jurisdictions for implementation and/or management of these and other associated measures.

- Table 3.6 shows that the 2012 RTP/SCS anticipates relatively low levels of funding for local streets and roads, including \$1.1 billion for FY2011-FY2015, \$1.1 billion for FY2016-FY2020, and \$1.2 billion for FY2021-2025. Funding is increased to \$7.9 billion for FY2026-FY2030 and \$9.6 billion for FY2031-FY2035. However, local street and road improvements offer the best opportunity for quickly improving mobility and realizing RTP/SCS goals. They also provide economic benefits which could translate into additional funding in the future. Funding for these programs should be increased and accelerated in the near future.
- One City of Tustin project which has both local and regional significance does not appear to be included in the RTP/SCS. It is therefore requested that the following project be added to the RTP/SCS:
  - Tustin Ranch Road extension from Walnut Avenue to Warner Avenue, including a new grade separation over Edinger Avenue and the OCTA/SCRRA Railway.
- In addition, the RTP/SCS should identify the regional transportation infrastructure deficiencies broken down by county for purposes of transparency.

Ms. Margaret Lin  
SCAG 2012 RTP/SCS and DPEIR  
February 8, 2012  
Page 5

Again, thank you for the opportunity to review and comment on the Draft 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (DPEIR) for the 2012 SCAG RTP/SCS. If you have any questions regarding the City's comments, please call Elizabeth Binsack, Community Development Director at (714) 573-3031.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Nielsen', written over a white background.

John Nielsen  
Mayor

cc: Hasan Ikhata, SCAG  
Dave Simpson, OCCOG  
Tustin City Council  
Jeffrey C. Parker  
Doug S. Stack  
Elizabeth A. Binsack  
Dana Ogdon  
Scott Reekstin



February 14, 2012

Pam O'Connor, President  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**RE: Comments on the 2012-2035 RTP/SCS—Need for Amendments to Freight Element**

Dear President O'Connor:

On behalf of the Natural Resources Defense Council and the Coalition for Clean Air, we write regarding the need for a near-term clean freight project in the Regional Transportation Plan (“RTP”). Specifically, we are concerned that there is not an emphasis in the RTP on near term projects that will help the region achieve its technology goals of creating a zero or near zero emission freight movement system. Accordingly, we respectfully ask that the RTP be amended to include short term projects in the constrained plan that will help advance cleaner technologies in the short-term.

In the 2006 Clean Air Action Plan (“CAAP”), adopted unanimously by both Boards of Harbor Commissioners for the Ports of Los Angeles and Long Beach, the ports committed to develop and implement a zero emissions container movement system. In pertinent part, the Port boards declared that —

This component of the program is focused on finding the next generation of transport solutions for goods movement. The ultimate goal is a 21st century electric powered system that will move cargo from our docks to the destinations within 200 miles that today are moved by truck. It may take 20 years to complete such a system but it will always be 20 years away unless in the next five years we build and test a demonstration prototype and perfect a detailed plan for widespread construction.<sup>1</sup>

Here we are six years later, and we are no closer to actual implementation of a zero emissions system. While there are a lot of discussions about these technologies, there is an imperative need for SCAG to be leaders on this issue. In that vein, SCAG needs to provide more support for this concept in the near-term.

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<sup>1</sup> San Pedro Bay Ports, 2006 Clean Air Action Plan, 141 (November 2006) *available at* <http://www.polb.com/civica/filebank/blobdload.asp?BlobID=3451>.

The RTP should be amended to include a project or projects that will help spur technology. A catenary system along the Terminal Island Freeway serving to connect the Port of Long Beach to the Union Pacific Intermodal Container Transfer Facility (“ICTF”) merits inclusion in the constrained portions in the plan. In the same vein, the RTP could also include other similar projects, including a catenary system along Alameda Street in the harbor area. At least one of these projects must be pushed forward in the near-term (e.g. next two years). The cost of such a system is estimated to be between 5 and 6 million dollars per mile on the high end. Furthermore, dollars should be allocated to procure trucks that can use this system. Accordingly, we recommend an initial allocation of 35 million for the entire project with the creation of a plan to increase the percentage of trucks that use this facility. Funding for this project could come from some combination of the ports, agencies responsible for clean air locally and statewide, and private industry. The key is to develop and implement the catenary system in the short term to help progress in actually achieving zero emissions goals. Finally, the catenary system should be incorporated as an enforceable measure in the State Implementation Plan. This type of strategy provides an ideal Transportation Control Measure. *See* 42 U.S.C. § 7408(f)(v), (vi); *see also* 42 U.S.C. § 7511A(e)(4). We would be delighted to collaborate with staff in determining how these projects should be included in both the constrained plan and the State Implementation Plan as an enforceable measure to push progress towards a true zero emissions system.

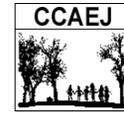
Please do not hesitate to contact us if you have questions about this recommendation.

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is written in a cursive, slightly slanted style.

Adriano L. Martinez  
Staff Attorney  
Natural Resources Defense Council

Luis Cabrales  
Deputy Director of Campaigns  
Coalition for Clean Air



BLACK WOMEN FOR WELLNESS



February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

Dear President O'Connor and Southern California Association of Governments Regional Council Members:

The undersigned appreciate the dedication and efforts of the staff at Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the recommendations in the plan that moves the region towards an improved transportation system while improving public health and air quality.

The 2012 RTP/SCS includes many smart growth strategies that will increase mobility, public health and environmental health standards. As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to:

- *Increase investment in active transportation strategies.*
- *Acknowledge that a regional zero emission freight system is needed in the region.*
- *Discuss gentrification issues as part of Environmental Justice.*
- *Monitor premature mortality due to PM2.5.*

Though SCAG has shown commitment to improving the region's *mobility, economy and sustainability* by including public health analysis in transportation planning policies, more can still be done to improve air quality, increase equity and improve our goods movement system.

The SCAG region faces immense public health and environmental challenges, and the RTP/SCS must be enhanced to address these issues. The SCAG region continues to have the worst air quality in the nation and contains "14 non-attainment and maintenance areas in four air

basins”<sup>1</sup>. Additionally, SCAG recognizes that 25% to 27% of the population “within the freeway adjacent areas are projected to see increases in their emission exposures to CO and PM”<sup>2</sup>. According to Figure 46 in the Environmental Justice Appendix, close to 60% of the population residing within 500 feet from the buffer area are Hispanic and in Quintile 1 (The Lowest Income Household). The issues of air pollution are even more acute in the SCAG region given the rampant prevalence of diesel equipment used in the freight industry. Residents in close proximity to highways, particularly those with high levels of diesel trucks, will experience increased rates of cardiovascular and respiratory disease, premature mortality, increased lung cancer incidence, decreased life expectancy, reproductive health problems, and increased asthma symptoms<sup>3 4 5 6</sup>. While we recognize that the goods movement sector is an economic driving force in the region, we cannot sit by idly and allow the immense damage to the health of our most vulnerable communities persist.

Given these challenges, we recommend several improvements that must be made to improve the RTP/SCS.

### **I. The RTP/SCS Must Do More To Promote Public Health Protections, Active Transportation and Equity.**

The RTP/SCS is the blueprint for years to come. As such, it must be designed to promote public health through choosing better transportation alternatives and making sure we spread the benefits of these investments to all residents in the region, regardless of race, income, or other social status. Moreover, we must make sure we minimize exposure to environmental harms.

### **II. The RTP/SCS Must Invest and Include Healthy and Equitable Policies.**

Implementing this recommendation requires addressing the following critical public health issues:

#### *A. Mitigate PM and CO exposure in high quality transit areas.*

The 2012 RTP/SCS will redirect 51% of new housing near High Quality Transit Areas (HQTA) providing an opportunity for healthy communities. Redirecting the growth of new housing closer to busy roads and freeways could violate the California Air Resources Board’s recommended 500 feet freeway buffer, and potentially increase CO and PM exposure and noise impacts. SCAG has acknowledged that 25% to 27% households living within freeway adjacent areas will see increases in their emission exposure to CO and PM. In addition to monitoring these areas for PM and CO, we recommend that SCAG also project and map out the areas that may be impacted as a result of the redirected growth up to the year 2035. We also recommend for SCAG to include current mitigation strategies in the EJ Toolkit and work with the local communities, health advocates and stakeholders to continue developing policies that will be included as part of the mitigation strategies for HQTA.

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<sup>1</sup> Pg. 18, VISON APPENDIX

<sup>2</sup> Pg. 122, EJ APPENDIX

<sup>3</sup> California Air Resource Board. Air Quality and Land Use Handbook: A Community Health Perspective. 2005. <http://www.arb.ca.gov/ch/landuse.htm>.

<sup>4</sup> Brunekreef B, Janssen NA, Hartog J. 1997. Air Pollution from truck traffic and lung function in children living near motorways. *Epidemiology* 8:298-303.

<sup>5</sup> VennAJ, Lewis S, Cooper M, Hubbard R, Britton J. 2001. Living near a main roadway the risk of wheezing illness in children. *Amer J Resp and Critical Care Med* 164(12):2177-80.

<sup>6</sup> Various studies:

Gauderman, W. James, Ph.D, et al., *N Engl J Med* 2004; 351:1057-1067.

Jun Wu et al., *Environmental Health Perspectives* 2009; 117: 1773-9.

McConnell, Rob MD et. al., *Lancet* 2002; 359:386-391.

Arden, Pope C III, PhD et al., *JAMA* 2002; 287; 1132–1141.

*B. Mitigate highway noise areas in communities of concern.*

Highway noise areas are also disproportionate to environmental justice communities with 22% of the affected population residing within roadway noise areas and 14% of the households below the poverty line<sup>7</sup>. Noise impacts have been associated with hearing impairment, hypertension and ischemic heart disease annoyance and sleep disturbance<sup>8</sup>. Further noise impact mitigation studies should be utilized in future 2012 RTP/SCS plans.

*C. Monitor and develop tools to avoid gentrification and displacement in TODs.*

SCAG's current analysis of 125 HQTAs around rail stations found that the demographics of HQTAs/TOCs are changing. Poverty rates are declining in these areas when compared to the rest of the region<sup>9</sup>. These results show that displacement and gentrification may be occurring in these areas. As such, gentrification should be acknowledged and policies need to be put in place to avoid this from happening. In addition to tracking the 125 rail stations, SCAG should:

1. Track commute time by race and income in Communities of Concern (COCs) and compare it to the region.
2. Set a baseline for jobs-housing fit by taking a "snap shot" of 4-to-5-mile buffer zone around major job centers, and compare the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good jobs-housing fit. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas.
3. Use the Compass Blueprint Program to advance a policy toolkit that highlights and recommends anti-displacement and anti-gentrification policy options in TOD areas, as an eligible subject for a Compass Blueprint grant proposal.

**III. The RTP/SCS Must Ensure That the Region has a Complete Network of Transportation Strategies that Connect Travelers to a Wider Range of Transportation Options.**

This entails implementation of the following recommendations:

*A. Increase investment in active transportation.*

In order to achieve true walkable and healthy communities we recommend for SCAG to increase its investments in Active Transportation strategies beyond the \$6 billion currently recommended.

*B. Increase investment in public transportation.*

Prioritize investment in bus rapid transit and taking existing infrastructure to include bus-only lanes instead of expanding highway to accommodate for additional capacity.

*C. Access, mobility and safety.*

In order to better connect the region that depends on non-motorized modes of transportation, first-mile/last-mile strategies should also include close-the-gap strategies that integrate active modes of transportation to allow for accessibility to employment and services. To better do this, SCAG should identify geographic areas with high concentrations of communities of concern and track their transportation access, cost, mobility, rent, and gentrification and displacement patterns

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<sup>7</sup> Pg. 127, EJ APPENDIX

<sup>8</sup> Passchier-Vermeer, W. and Paschier F., W. Noise Exposure and Public Health. *Environmental Health Perspectives*, *Environmental Health Perspectives* 108(1):123-131, March 2000.

<sup>9</sup> Page 93, EJ APPENDIX

(using the seven indicators to track early signs of displacement or gentrification)<sup>10</sup>. The data can be used in future RTP/SCS and determine where close-the-gap strategies would best serve the region and address any adverse impacts that transportation projects can cause to communities of concern. SCAG should also use the data to determine what communities are underserved by transportation projects and connect those underserved communities to high opportunity areas.

#### **IV. SCAG Must Support Federal Policies That Benefit Active Transportation.**

Given the current state of the federal transportation bill and efforts to strip dedicated funding from MAP-21 in the Senate and the House American Energy and Infrastructure Jobs Act in the House, we are concerned that expected federal revenues for bicycle and pedestrian enhancements may not materialize.

To this end we request that SCAG fully support an amendment offered by Senator Lautenberg in the EPW Committee to ensure that total funds available in the “additional activities” reserve fund in MAP-21 for Recreational Trails, Safe Routes to School, and bicycle and pedestrian investments are equal to those currently in SAFETEA-LU. Additionally, this amendment would ensure that regions within states are able to have direct and first access to these funds so that cities throughout the SCAG region are able to directly apply for and receive funding for important bicycle and pedestrian projects. As the Senate bill progresses to the floor there will be opportunities for Senator Boxer to incorporate these provisions into the final bill and it is important for SCAG to make clear it supports them.

#### **V. The Freight Strategies in the RTP/SCS Must Be Improved.**

We remain deeply concerned about the freight elements of the RTP/SCS. While the plan acknowledges the need to move to zero emissions technologies, it provides little substance on how it will actually happen. The RTP must be more rigorous. To support this, we suggest the following improvements to the freight elements of the plan.

##### *A. The RTP/SCS must actually require creation of a zero-emission truck and freight goods movement for the region.*

Several issues must be addressed in the 2012 RTP/SCS before it is adopted with regard to how freight is moved through the year 2035. Goods movement strategies must ensure that the South Coast Air Basin meet federal air quality standards set forth in the Clean Air Act. Currently, the plan provides little detail on this issue, including how black box reductions will be achieved from the substantial portion of emissions from freight. While we agree with the many experts who “question the long-term viability of continued reliance on fossil fuels,” the RTP/SCS lacks details on how best to actually achieve this goal<sup>11</sup>. The “uncertainty of a petroleum-based future” needs to be at the forefront of the 2012 RTP/SCS where any expansion plans that increase a petroleum-based roadway system and raise Vehicle Miles Travel (VMT) must be curtailed<sup>12</sup>. The RTP/SCS needs to do more than just put words on paper about the need for this system. Future projects must be required to incorporate these technologies or they should not be built.

Financing these cleaner technologies is an important consideration for SCAG. Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero

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<sup>10</sup> Pg. 93, EJ APPENDIX

<sup>11</sup> Pg. 29, DRAFT 2012 RTP/SCS

<sup>12</sup> Pg. 29, DRAFT 2012 RTP/SCS

emission freight and truck strategies should be a central component of the strategy. For these reasons, we recommend that SCAG consider including the following funding strategies:

1. Develop a clear assessment of various financing options including various models of public-private partnerships that could make zero-emission technology options possible. Recommend a \$30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports<sup>13</sup>.
2. Use currently available clean truck technology and incentivize it through funding and or by way of preferential access lanes at terminals.
3. Reinststitute the diesel truck fee to incentivize clean, alternative fuel trucks.
4. Improve fee structure to give preference to clean alternative fuel trucks.

*B. The RTP/SCS must implement near-term solutions to reduce greenhouse gas emissions from freight.*

We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the 2012 RTP/SCS in other areas. In particular, CO<sub>2</sub> emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035. Even more dramatically, CO<sub>2</sub> emissions from rail would increase at least 50% by 2023 and at least 123% by 2035<sup>14</sup>.

Given that “This RTP Goods Movement Environmental Strategy was developed to address community concerns, federal attainment requirements, and *climate change issues*,” it is problematic that near-term solutions are not more fully articulated<sup>15</sup>. Near-term strategies to clean up goods movement must be fully integrated into the 2012 RTP/SCS. We would like to work with you before the final version of the 2012 RTP/SCS to resolve this deficiency. Indeed as stated “For trucks, an aggressive program to bring more currently available, clean fuel trucks and hybrid trucks into service represents the best near-term strategy”<sup>16</sup>. Yet no such program is identified for either trucks or rail.

The ports of Los Angeles and Long Beach have left a gaping hole in clean air planning by not establishing targets and reduction plans for greenhouse gases (GHGs). SCAG and the 2012 RTP/SCS should demand that the Clean Air Action Plan be augmented with GHG reduction plans. Both ports have in the past promised to have such plans but neither has released one<sup>17</sup>. Such plans should complement and accelerate SCAG’s vision for increased efficiencies and the deployment of cleaner technologies.

While we commend the steps to evaluate and seek funding for longer-term zero and near-zero emissions technologies, the severity of the pollution and congestion from freight activities merits additional attention in the near-term. And while the 2012 RTP/SCS rightly considers heavy-duty trucks and rail emissions, it would be worth devising a set of strategies that account for the differences among local freight service and that of port origin/destination. Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector’s 2<sup>nd</sup> largest emitter of NO<sub>x</sub><sup>18</sup>.

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<sup>13</sup> Haveman, Jon, and Thornber, Christopher. Container Fees and Commercial Benefits of Improved Waterborne Goods Movement Infrastructure in California. *Beacon Economics*. August 2007. [http://www.coalitionforcleanair.org/images/stories/Haveman\\_Report\\_Final\\_Aug2007.pdf](http://www.coalitionforcleanair.org/images/stories/Haveman_Report_Final_Aug2007.pdf)

<sup>14</sup> Pg. 33, GOODS MOVEMENT APPENDIX

<sup>15</sup> pg. 33, GOODS MOVEMENT APPENDIX, emphasis added

<sup>16</sup> Pg. 39, GOODS MOVEMENT APPENDIX

<sup>17</sup> POLB has initiated a GHG mitigation fund to attempt to offset some of its increased emissions

<sup>18</sup> Pg. 32, Figure 8, GOODS MOVEMENT APPENDIX

In the section On-Dock/Near-Dock Rail Capacity Enhancements, the 2012 RTP/SCS appropriately expresses preference for on-dock rail “By allowing more on-dock rail, truck traffic between the San Pedro Bay Ports and distant rail yards can be reduced. Use of on-dock rail eliminates truck vehicle miles of travel (VMT) and associated emissions”<sup>19</sup>. SCAG should demand a sequencing of projects that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost.

#### **VI. The RTP/SCS Must Remove the East-West Corridor Route Project.**

Recommending to build an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the region and particularly for local communities of concern (COC). Additionally, if the east-west corridor project goes forward, an increase in truck traffic per day (from 58,000-78,000) could increase noise pollution and air pollution<sup>20</sup>.

*The Goods Movement Environmental Strategy and Action Plan* schedules full operational deployment of zero and near zero-emissions for trucks in 2018<sup>21</sup>. This plan prematurely predicts that the infrastructure, market and technology will be available for use without taking into consideration funding shortfalls and without putting in place earlier interventions. In the meantime, east-west corridor adjacent communities will be adversely impacted by displacement, or over-burden suffering from adverse health and quality of life impacts associated with the construction of the project and the trucks that will eventually utilize the route. SCAG must go beyond investing in research and guarantee that all lanes classified as zero-emission truck-only lanes only be used by zero-emission trucks.

Before considering adding this project to the RTP/SCS, SCAG must address the following:

1. Provide health and community demographic data on impact on the east-west corridor project. Specifically data that shows potential neighborhoods which may be displaced, noise and air quality impacts on surrounding communities, race, class, socio-economic status of the communities that will be impacted and how many of them are COCs.
2. Develop an analysis of the local roadway systems that trucks will utilize once they have reached their destination.
3. Develop an analysis of the total number of on-ramps and off-ramps planned for the east-west corridor, an approximation of where they will be (i.e. which streets will be used for entering and exiting the east-west corridor), and the configuration/style of each on-ramp and off-ramp.
4. Define the performance measures that would outline how success would be measured for the proposed east-west corridor, including anticipated truck traffic counts.
5. Set outreach and communication guidelines that allow for greater public participation from the general public and pertinent partners and timely feedback to questions asked.
6. Include an outreach and engagement plan that includes impacted COCs, stakeholders and health advocates, as part of the Goods Movement and Environmental Strategy Action Plan.

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<sup>19</sup> Pg. 27, GOODS MOVEMENT APPENDIX

<sup>20</sup> Pg. 20, GOODS MOVEMENT APPENDIX

<sup>21</sup> Pg. 21, GOODS MOVEMENT APPENDIX

## **VII. SCAG Must Support National Efforts to Create a Strategic Plan for the Freight System.**

Given the limitations with funding our goods movement and particularly the zero emissions and near zero emissions freight strategy, we encourage SCAG to include language that clarifies the current federal funding constraints and alter the 2012 RTP/SCS to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100. As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding and the establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Senate and House.

SCAG should actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program, and support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written. We support the addition of this language as offered by Senator Lautenberg and the inclusion of Senator Lautenberg's FREIGHT Act of 2011 (Focusing Resources, Economic Investment, and Guidance to Help Transportation) in the Commerce Committee bill S. 1950 the Commercial Motor Vehicle Safety Enhancement Act of 2011 which would create a national strategic plan for the freight system, a competitive grant program, and establish clear goals and objectives including reducing emissions, improving safety and efficiency, enhancing economic competitiveness, use of innovative technologies, and improving the state of repair of existing infrastructure.

## **VIII. The RTP/SCS Must Focus Attention on Cleaning Up Existing Freight Corridors, Not Just the Proposed New Projects.**

While we welcome zero emission technology by the year 2035, more short term gains must be implemented. SCAG should incorporate what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology). Additionally, SCAG member governments must include a zero emission corridor from the ports to the ICTF or along Alameda Street and strengthen specific requirements in new projects beyond "bare minimum" standards used in current projects.

## **IX. The RTP/SCS Must Include Public Health as an Overarching Goal of the Goods Movement Element.**

More and more research is associating air pollution with asthma prevalence, poor lung function and a series of other health impacts. The California Air Resources Board states that the "prevalence of asthma in the U.S. has increased by more than 75% since 1980"<sup>22</sup>. Furthermore results from the USC Children's Health Study, a ten year study, show that children in Southern California's more polluted communities "suffer reduced growth of lung function, asthma exacerbations, more school absences, and new onset asthma"<sup>23</sup>. The public health evidence is growing. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, and not just the region's economic growth. SCAG must:

<sup>22</sup> California Air Resources Board. Asthma and Air Pollution. <http://www.arb.ca.gov/research/asthma/asthma.htm>, May 25, 2010.

<sup>23</sup> Hricko, Andrea M. Road to An Unhealthy Future for Southern California's Children. *University of Southern California Urban Initiative, Urban Policy Brief*, 2004.

1. Include public health as an overarching goal in the Goods Movement Element and include performance standards to measure improvements.
2. Include public health as an overarching and priority and goal in the \$2.1 billion annual freight program included in the Environment and Public Works Committee.
3. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially in low income communities of color overburdened by air pollution and higher rates of uninsured residents.

**X. Public Participation Failures Must Be Remedied.**

Outreach and education to the public, especially on the onset on this process, was not sufficient to ensure that an adequate representation of members from impacted communities participate and give meaningful input. There were not enough public meetings or an adequate outreach strategy to ensure that there was more community involvement in this important process. Furthermore, a Goods Movement Steering Committee was established under SCAG to provide guidance and recommendations to SCAG's 2012 RTP/SCS, however, no formal process was established to receive formal recommendations from this group on the 2012 RTP/SCS.

We commend SCAG for completing the first Sustainable Community Strategy for the region and look forward to working with SCAG to ensure that it truly is a successful SCS by prioritizing health and equity.

If you have any questions about our recommendations, please do not hesitate to contact Patty Ochoa at 213-689-9170 or via email at [pochoa@psr-la.org](mailto:pochoa@psr-la.org).

Sincerely,

Patricia Ochoa, Environment and Health Coordinator  
Physicians for Social Responsibility- Los Angeles

Luis Cabrales, Deputy Director of Campaigns  
Coalition for Clean Air

Jocelyn Vivar Ramirez, M.P.H., Research and Policy Analyst  
East Yard Communities for Environmental Justice

Ruben Cantu, Program Director  
California Pan-Ethnic Health Network

Barbara Lott-Holland, Co-Chair of the Bus Riders Union  
Bus Riders Union

Maya Golden-Krasner, Staff Attorney  
Communities for a Better Environment

Sissy Trinh, Executive Director  
Southeast Asian Community Alliance

Isela Gracian, Associate Director  
East LA Community Corporation

Cynthia Babich, Founder and Executive Director  
Del Amo Action Committee

Penny Newman, Executive Director  
The Center for Community Action and Environmental Justice

Janette Robinson Flint, Executive Director  
Black Women for Wellness

Gisele Fong, PhD, Executive Director  
End Oil / Communities for Clean Ports

Jesse N. Marquez, Executive Director  
Coalition for a Safe Environment

Paulina Gonzalez, Executive Director  
Strategic Actions for a Just Economy

Gabrielle Weeks, Executive Director  
Long Beach Coalition For a Safe Environment

Drew Wood, Executive Director  
California Kids IAQ

Ricardo Pulido, Executive Director  
Community Dreams

February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: Comments on Draft 2012-2035 Draft RTP/SCS

Dear Ms. Lin:

Thank you for the opportunity to comment on SCAG's Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy ("Draft RTP/SCS" or "SCS"). We understand that this is an enormous undertaking and appreciate SCAG's efforts in this process. We look forward to playing a constructive role in the further development of the SCS.

As explained below, we are concerned that the draft RTP/SCS as proposed would result in an inappropriate use of the regional growth forecast planning effort to encroach on local land use authority and jurisdiction. We therefore request that SCAG (1) extend the comment period and make transportation analysis zone (TAZ) data available for public review and comment; (2) correct the TAZ data and maps to accurately reflect current local planning decisions including entitled projects; and (3) revise the SCS so that consistency determinations are made not at the small-scale level of a TAZ, but at the jurisdictional level to allow reasonable flexibility and appropriate land use decision making authority at the local level.

**1. The SCS does not appear to account for projects already in process**

Brooks Street represents the owners of thousands acres of property in southern California, and has a long history of top-quality developments in the SCAG region. However, we are concerned that the SCS process has not fully accounted for projects that are already in process. Brooks Street has projects in southern California that are fully entitled and approved for build-out, as well as proposed projects with pending applications that represent a substantial investment of resources to design, plan and communicate with the community and responsible agencies. While the SCS itself states that it was created with input from local jurisdictions (see, for example, Draft RTP/SCS p. 111), we are concerned that the growth projections contained in the SCS and Land Use Pattern Maps do not in fact reflect the land use decisions that have been made by local jurisdictions. More specifically, while the Draft RTP/SCS indicates that it has shifted projected densities from less developed areas to the urbanized core, nowhere does the SCS clearly state that those shifts in density take into account development projects that are either already approved or that are reasonably foreseeable projects which local jurisdictions have already spent considerable resources processing.

## **2. Underlying TAZ data must be released to allow meaningful public comment**

Moreover, the SCS's treatment of approved projects is impossible to determine from the information that SCAG has made available to the public. The 2035 Land Use Pattern Maps, which are intended to depict projected density and land use, are at such a large scale, with such slight color gradations, that they cannot be interpreted in any meaningful way. The SCS itself does not seem to contemplate that these maps will be important to future transportation and land use decisions. Instead, the SCS focuses on the projected density contained in the data that underlies the maps -- data that SCAG has not released to the public. The SCS states that the land use projections contained in the SCS are based on the distribution of growth forecast data to transportation analysis zones. (RTP/SCS, p. 122.) According to the SCS, the TAZ data contains forecasted housing, population, and employment data, which the SCS used to create "Community Types" and more refined "Development Types" that contain average use designations, densities, and building intensities. The SCS states that a Development Type, including an average residential density, has been assigned to each TAZ for purposes of creating the SCS. (Draft RTP/SCS, p. 123.) However, it cannot be determined whether this assignment was made in a manner that takes existing conditions (including approved and reasonably foreseeable projects) as a baseline for these projections, nor can it be determined how the forecasting was done or how it was distributed across the TAZ.

Despite the critical role of the TAZ data in developing the SCS, we are not aware that SCAG has made this data available for public review and comment in any meaningful way. We were able to obtain partial data, showing housing densities only, from other agencies involved in the SCS process. These data do not contain employment or population forecasts, and do not contain any Community Type or Development Type designations which, according to the SCS, have been assigned to each TAZ. It is not possible for the public to provide meaningful comment on the SCS without access to the underlying data on which density and land use projections are based. In the absence of the underlying data and modeling supporting the proposed plan, we are substantially impaired in our ability to provide meaningful public comment on the technical and legal adequacy of the plan. In particular, we cannot assess whether the underlying data adequately reflects all developments as approved. Under the federal (5 U.S.C. § 500 *et. seq.*) and California Administrative Procedures Acts (Gov. Code §§11340 *et seq.*, including § 11346.2(b)(6)), the opportunity for public comment must include disclosure of the data and technical studies in time to provide meaningful public comment. *See, e.g. Solite Corp. v. EPA*, 952 F.2d 473, 484 (D.C.Cir.1991) (*per curiam*).

While we are not confident that the data is either accurate or complete, we have reviewed what data we were able to obtain. Based on our review we conclude that the forecasted housing densities do need to be corrected, as the numbers clearly do not reflect either existing entitlements or pending, reasonably foreseeable projects.

## **3. Implications of consistency with underlying TAZ data**

The importance of the TAZ data is not limited to understanding how the SCS was created. In addition to being the basis for creation of the SCS land use projections, according to the SCS, the TAZ data is to be relied on in future determinations as to whether a project is consistent with the SCS. The SCS states:

"SCAG suggests that utilizing community types at the TAZ level of geography (which an average size of 160 square acres) offers local jurisdictions adequate information and flexibility to make appropriate consistency findings for projects to be eligible to receive CEQA streamlining benefits." (Draft RTP/SCS p. 122.)

"One way of determining consistency [with the SCS] is if a proposed residential/mixed use or TPP [Transit Priority Project] conforms with the Development Type designated for a TAZ." (Draft RTP/SCS, page 148.)

Despite these explicit statements that the existing TAZ data will be critically important to future decisions affecting projects, SCAG has not provided the public the opportunity to review and comment on the TAZ data in any meaningful way.

Significantly, a project's consistency with the SCS -- which is to be determined at the TAZ level according to the SCS -- affects not only the availability of CEQA streamlining incentives, but can have adverse consequences for the availability of federal funds for transit improvements that would serve the project. Transit improvement projects relying on federal funding must be consistent with an approved RTP, and with the adoption of SB 375, that includes consistency with the Sustainable Communities Strategy portion of the RTP as well. (40 CFR 93.102; 42 U.S.C. 7506.) Thus, if the Draft RTP/SCS has shifted density away from approved or pending projects, those projects stand to lose critical transit improvements. The loss of transit improvements could impair project feasibility, or create new unmitigated impacts if traffic mitigations become unfunded, which could result in an unlawful taking of private vested property rights for those projects that have already been approved by local jurisdictions. In many cases, approved projects also involve executed development agreements, which means that violation of contractual rights could also result, causing difficult situations for developers and local jurisdictions.

We are concerned that a project's inconsistency with the growth projections contained in the SCS may have broader implications as well. Local jurisdictions will be under considerable pressure to conform their general plans to the density, intensity, and land uses contained in the SCS, or risk losing transportation funding throughout their jurisdictions. While all the implications of a project's inconsistency with the SCS have yet to be determined, we are concerned that by shifting density away from locally approved and pending projects, the SCS is creating land use policy in violation of SB 375's mandate that the SCS must not supersede the land use authority of cities and counties. (Gov't Code 65080(b)(2)(J).)

#### **4. RTP/SCS consistency should be determined at the jurisdictional level**

The TAZ maps are a modeling tool for engaging in a regional planning and evaluation process. The feasibility of achieving the precise results in any particular TAZ area has not been evaluated or confirmed by any city council or board of supervisors, and as explained above it appears that the TAZ data and maps for 2035 do deviate from general plans and vested entitlements that have been approved by these elected officials. While we understand elected bodies or senior administrative staffs of local jurisdictions may have approved local input for the overall population and household numbers within their respective jurisdictions, we believe they have not approved the TAZ data or maps. Accordingly, requiring consistency determinations concerning use designations, density, and building intensity at the small scale of each TAZ would be inappropriate and overly-prescriptive.

Again, SB 375 specifically precludes SCAG from interfering with local land use decisions.<sup>1</sup> SB 375 requires that an SCS “identify the *general* location of uses, residential densities, and building intensities *within the region*...” Calif. Government Code § 65080(b)(2)(B)(i) (emphasis added). Thus there is no legislative mandate that SCAG identify the location of land uses, densities and building intensities within the region more precisely down to a TAZ level. Instead, SCAG should appropriately identify these characteristics at a level consistent with the need for reasonable flexibility and local control. At the lowest, the level of comparison should be at a jurisdictional level – particularly given that there are nearly 200 jurisdictions within the SCAG region. Accordingly, we urge SCAG to identify such characteristics at no finer a scale than at the lesser of (i) the jurisdiction, and (ii) the sub-region (i.e., where unincorporated county land is divided into sub-regions).

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<sup>1</sup> SB 375 provides in pertinent part:

- "Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land . . . "
- "Nothing in this section shall be interpreted as superseding the exercise of the land use authorities of cities and counties within the region."
- "Nothing in this section shall be interpreted to authorize the abrogation of any vested right whether created by statute or by common law."
- "Nothing in this section shall require a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan . . . ." (Gov't Code section 65080(b)(2)(J))

Despite SB 375's mandate that the SCS not regulate land use, the draft RTP/SCS "shifts" households "from the periphery into the urbanized core" stating that much of this shift "will occur naturally in the marketplace," and that this "shift" was done "per consultation with the local jurisdictions." (Draft RTP/SCS p. 128.) However, this shift does not "occur naturally," nor through a "consultation" process between agency staff that excludes the public. Instead, such a shift can only occur, if at all, as part of a separate and lengthy discretionary development application process involving requests to local land use jurisdictions to amend their general plans, specific plans, areas plans, and zoning. In short, there is no "shift" to high-density housing in some local jurisdictions, and away from housing density already approved by other jurisdictions, unless and until the local land use jurisdictions adopt the requested discretionary approvals.

#### **4. Conclusion**

The draft RTP/SCS represents a substantial and important regional planning effort. We believe the current draft needs to be corrected to reflect current local land use planning decisions, and to ensure that the regional growth projection process is not implemented in a manner that infringes on either vested property rights or the land use authority of local jurisdictions. We appreciate SCAG's consideration of the comments provided in this letter and look forward to your responses. If you should have any questions, please do not hesitate to contact me.

Sincerely,



Scott Goldie



February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**SUBJECT: 2012-2035 Regional Transportation Plan**

Dear Ms. Lin,

On behalf of the Valley Industry and Commerce Association (VICA), thank you for your commitment to the transportation needs of Southern California.

While we appreciate the inclusion of a handful of major San Fernando Valley-centered projects in the Regional Transportation Plan (RTP), we are disappointed by the insufficient appropriations for these projects and the lack of investment overall in the San Fernando Valley. Specifically, no funding is directed to renovations of I-101 between downtown Los Angeles and the city of Calabasas or improvements to I-405 north of the I-101 interchange. Furthermore, I-134, I-170, and the major arterials of the Valley receive minimal investment.

Despite \$40 billion in financing secured for Measure R projects in the greater San Fernando Valley, the only Valley projects in the Federal Transportation Improvement Plan (FTIP) are the renovation of the Interstate-101 off-ramp at Van Nuys Boulevard; the freeway connector at the I-101 and I-405 interchange; the I-405 Corridor Mass Transit project through the Sepulveda Pass; the studies of the Van Nuys corridor and Burbank-Glendale-Pasadena Airport intermodal ground access; and expansion of transit centers at Pierce and Mission Colleges. These projects are of vital regional significance to the Valley, but they are only the tip of the iceberg.

Key sections of the I-101 freeway need to be renovated to relieve bottlenecks and increase roadway safety between the Valley and downtown Los Angeles. These sections include the I-101 interchanges with the I-170 and I-134, which connect commuters and clients with the north, east and west San Fernando Valley. The roadway degradation along this I-101 corridor requires immediate attention and should be included in the RTP.

The north and west Valley also depend heavily on I-405. To reduce traffic and enable quicker, more efficient transportation between the Valley and West Los Angeles, mass transit solutions are necessary. The I-405 Mass Transit project through the Sepulveda Pass is the first step. A planning process and full financing must be put into place without delay.

While renovation of I-101 and I-405 are pressing, their effective use will not be possible without proper maintenance of the transportation system that serves these freeways. While the Financially-Constrained RTP Projects and Strategic Plan lists contain a few projects along major Valley arterials,

this system requires immediate restoration and improvement. Van Nuys Boulevard, Sepulveda Boulevard, Riverside Boulevard, Ventura Boulevard, Mulholland Drive, Laurel Canyon Boulevard, Victory Boulevard, Sherman Way, Burbank Boulevard, Reseda Boulevard, Topanga Canyon Boulevard, De Soto Avenue, Vineland Boulevard, Hollywood Way, Canoga Avenue, Vanowen Street, Nordhoff Street and Lankershim Boulevard are just a few of the several roadways critical for employees and clients to access the Valley using I-101 and I-405. The City of Los Angeles recently submitted a list of additional "Local Highway" projects, the majority of which target major Valley arterials. We ask that you review this list and include several—if not all—of the identified projects in the Strategic Plan.

The sections of I-170, I-134 and I-5 freeways connecting the east San Fernando Valley cities of Burbank and Glendale to the rest of Los Angeles County also receive only minor attention in the RTP. Roadway repair and mass transit options along these routes are necessary for Bob Hope Airport access and mobility into and within these east Valley cities. We ask that you increase investment in the Burbank-Glendale-Pasadena Airport intermodal ground access study and add renovations of the East Valley arterials to the Strategic Plan.

Thank you for considering our recommendations. We look forward to full funding of the San Fernando Valley projects on the Federal Transportation Investment Plan and Financially-Constrained RTP Projects lists, as well as expansion of the Strategic Plan to include critical Valley projects.

Sincerely,



David Adelman  
Chair



Stuart Waldman  
President

CC: Hasan Ikhata  
Southern California Association of  
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February 14, 2012

Mr. Hasan Ikhata  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

This letter transmits San Bernardino Associated Governments' (SANBAG's) comments on the Southern California Association of Governments' (SCAG's) draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated draft Program Environmental Impact Report (PEIR). This is pursuant to SCAG's request for comments, with a closing date of February 14, 2012.

SANBAG recognizes and appreciates the extensive effort and deliberations that went into the RTP/SCS by SCAG staff and policy committees. We recognize that the RTP/SCS has been developed in the context of the largest and most geographically and demographically diverse metropolitan area in the United States, involving a great number of complex and challenging issues. SANBAG commends the efforts of SCAG staff and supports approval of the Plan by the April deadline, with some suggested clarifications. Our comments on the draft RTP/SCS and PEIR are as follows:

1. The RTP/SCS growth forecasts should be adopted at the County-level, not at the city or transportation analysis zone (TAZ) level. SANBAG needs the ability to adapt the forecasts to development trends and new information that will inevitably come to light at the small-area level over the next 4-year RTP/SCS cycle. This is consistent with SCAG's approvals in the past.
2. The growth distribution at the transportation analysis zone (TAZ) level needs to be adjusted to be consistent with the distribution of growth for households and employment being submitted by SANBAG in parallel with the comment letter. The growth distribution is based on the distribution of households and employment previously submitted by SANBAG, together with adjustments for the Plan Alternative of the RTP/SCS. No change is being suggested in the city-level distribution of growth.

3. Please confirm that the East-West Freight Corridor (dedicated truck lanes) will continue from SR-60 northerly on the I-15 and terminate just to the north of I-10, with appropriate connector ramps to and from I-10 east of I-15. This is stated in the text of the draft RTP/SCS, but some of the maps and the transportation model networks are not yet consistent with this.

4. The Program EIR uses the phrase “local jurisdictions can and should...” or “project sponsors can and should...” in most of the local-level and project-level mitigation measures referenced in the EIR. SANBAG’s understanding is that the mitigation measures are designed to provide local jurisdictions and project sponsors with choices, not requirements, as they seek to implement local transportation and development projects in the context of the RTP/SCS goals and objectives. However, CEQA also requires that mitigation measures be feasible and enforceable (CEQA Guidelines Section 15126.4). As drafted with the language “local jurisdictions can and should,” the mitigation measures are implied to be feasible and enforceable. Therefore, SANBAG requests the mitigation measures be revised to clarify their intent. SANBAG suggests replacing the wording “local jurisdictions can and should...” or “project sponsors can and should...” with “SCAG shall encourage local jurisdictions to ....” SCAG should continue to play a role of facilitation for local jurisdictions and subregional agencies to build technical expertise, provide grant funds, disseminate information, and coordinate responses to regional issues. These are actions that are under the control of SCAG, the responsible party under CEQA, and can be monitored and enforced.

5. SANBAG recommends that those mitigation measures that are either the same as or similar to an existing regulation simply reference the regulation without restating the contents of the regulation. Local jurisdictions and project sponsors are already responsible for complying with regulations, and restating or paraphrasing a regulation in the PEIR could cause confusion in the future as regulations are modified. A summary of the regulation can be provided as information, but a restatement of the regulation in the PEIR with the “can and should” language may be counterproductive. The PEIR should also be careful to distinguish between guidelines and regulations. These changes will avoid potential future conflicts between a PEIR mitigation measure and an adopted regulation.

We would also like to request the following modifications to the project list, as submitted to SCAG staff through the standard RTP long-range project list modification and FTIP database update processes. These changes have been previously communicated to SCAG staff subsequent to the release of the Draft RTP and are being confirmed below.

**Major project modifications include:**

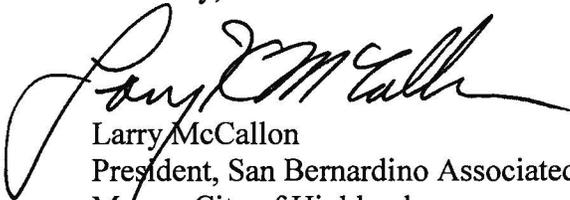
- 1830 – I-10 Cedar interchange – Schedule Change
- SBD41339 – I-10 Pepper interchange- Schedule Change
- 200152 – I-15 Arrow Rte. Interchange - Schedule Change
- 0H1300 – I-15 Duncan Canyon Interchange - Schedule Change
- 20061201 – I-15/215 Devore Interchange- Schedule Change
- SBD031279 – I-15 Rancho Interchange - Schedule Change
- 35556 – I-15 VV-Barstow - Schedule Change
- 200451 – US 395 from I-15 to 1.8 Miles S. of Desert Flower Road – Interim Widening from 2-4 lanes
- 34040 – US 395 Expressway – Widen from 2-4 lanes from High Desert Corridor to Farmington Road
- 981118 – Omnitrans Bus Service - Schedule Change
- 20040804 – Needles – I-40 Connector – Downscope project

**Major project deletions/completions include:**

- SBD31808 – I-10 Riverside – Completed Project
- 0H930 – I-10 Waterman – Completed Project
- 43320 – I-10 Live Oak – Completed Project
- 47221 – I-15 Etiwanda (rehab. SHOPP) – Completed Project
- 34041 and 34042 – US 395 New Expressway – Deleted Combined Projects
- 4G0117-LR – Safety Upgrade – Milliken Ave. – Delete Project
- 4A07039-LR – Valley from Cherry to Alder (2-4 lanes) – Delete Project
- 4H01011-LR – HOV Connector (I-10/I-15 North to West) – Delete Project
- 4H01010-LR – HOV Connector (I-10/I-15 South to West) – Delete Project
- 4H01009-LR – HOV Connector (I-10/I-215 South to East) – Delete Project

We look forward to a productive discussion of all the comments in the coming weeks and the approval of the RTP/SCS in April.

Sincerely,



Larry McCallon  
President, San Bernardino Associated Governments  
Mayor, City of Highland



**STEPHEN W. ROGERS, P.E. CONSULTING**

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February 14, 2012

Southern California Association of Governments

818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor

Los Angeles, CA 90017

Attn: Margaret Lin Sent by email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

**SUBJECT: DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN/  
SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS)  
PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)**

Dear Ms. Lin:

Thank you and SCAG for this opportunity to provide written public comments pertaining to the subject Draft PEIR document for the 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/ SCS) document, dated December 2011. The following additional mitigation measures and sustainable community strategies are proposed for SCAG's consideration and inclusion in the Final Program Environmental Impact Report (PEIR), as appropriate:

1. The *Friendly Communities* program is being developed as a private-public partnership, to focus on the needs and quality of life issues unique to residents of unincorporated area communities, and other communities of special interest. This program could be replicated statewide/nationwide.
2. A Countywide *Vehicle Asset Management Plant Program (VAMPP)* should be considered for strategic location along major routes within the regional highway network, to improve the implementation of standardized maintenance programs for governmental, transit and private fleet asset services management. This program could be replicated statewide/nationwide.
3. Technological advances in vehicle, truck and heavy equipment lubrication, translating into significant emissions reductions and extended oil service drain intervals, can be realized by the use of *Synthetic Lubricants* and fleet conversion to bypass filtration. In a recent study, reported December 2011, *Amsoil Synthetic Lubricants Increased Fuel Economy 6.54 %* in diesel trucking applications.

C: San Bernardino County Board of Supervisors  
City of Redlands City Council



# City of Anaheim PLANNING DEPARTMENT

February 14, 2012

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

**RE: DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN,  
SUSTAINABLE COMMUNITIES STRATEGY, AND DRAFT  
PROGRAM ENVIRONMENTAL IMPACT REPORT**

Dear Mr. Ikhata:

Thank you for the opportunity to submit comments on the Southern California Association of Governments (SCAG) Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and its associated Draft Program Environmental Impact Report (PEIR). City staff recognizes the monumental efforts undertaken by SCAG to prepare these extremely important regional documents.

The City of Anaheim is a recognized leader in the region for establishing creative and innovative new, infill and refill development strategies that support many of SCAG's objectives, particularly as they relate to transportation infrastructure, urban growth, and sustainability. The City has also taken a proactive role in reducing regulations and promoting incentive based approaches to encourage business and development growth, preserve existing neighborhoods and help foster a freedom friendly regulatory environment. Our comments below are based on the extensive experience the City has in proactively supporting infill and refill development and reflect the City policies of reducing regulations and promoting incentive based approaches instead of increasing regulation. It is important that the RTP/SCS and PEIR documents do not contain provisions that restrict the City's flexibility to develop the policies, strategies and programs that will work best for our community while meeting regional goals.

Staff has also reviewed and concurs with comments from the Orange County Transportation Authority (OCTA) and the Orange County Council of Governments (OCCOG). Some of these OCTA and OCCOG comments are restated and highlighted in the comments below.

### **Comments on the RTP and SCS**

**Expanded High Occupancy Toll (HOT) Lanes System** – Staff concurs with the OCTA comments identifying a need for additional information on the HOT Lane network included in the RTP. An expansion of toll facilities in the region that is not

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consistent with the Long Range Transportation Plan (LRTP) prepared by the OCTA has been included in the RTP. Specifically, the RTP/SCS identifies a program to allow extra capacity in High Occupancy Vehicle lanes (HOV lanes or carpool lanes) to be sold to single-occupant drivers, thus converting these facilities into High Occupancy Toll (HOT) lanes. This change is shown along the SR-91 from the Orange/Los Angeles County border and connecting with the existing SR-91 toll facilities. Several miles of this facility are within or are partially within the City of Anaheim and are bounded by residential neighborhoods. Because the facility is not currently funded through the OCTA LRTP and does not have the capacity to support a toll system, more information is necessary to evaluate the project's feasibility.

*Request:*

1. *Please include text in the RTP stating that any expansion of the HOT lanes is tentative and would require additional study to determine right-of-way impacts, community issues, and overall feasibility.*

California High-Speed Rail Authority (CHSRA) Project – Staff concurs with the OCTA comments supporting a phased delivery approach, which includes early investment in the existing LOSSAN and Metrolink infrastructure, and indicating it is more prudent to begin implementation at the “bookends” of the system. City staff also submitted a letter to the CHSRA regarding the Draft 2012 Business Plan (see Attachment 1), indicating that implementing this “bookend” approach in the most urbanized regions of the State at the onset of the project is needed to enhance the passenger experience, reduce travel times, improve safety and provide critical connections to the existing passenger rail systems in these regions. It would also maximize the investment of State and Federal funds so that these critical improvements will be implemented.

Sustainable Communities Strategy – Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional SCSs that SCAG is then required to incorporate into the regional SCS. In Orange County, OCCOG and OCTA developed a countywide SCS (OC SCS) to be included as the County's contribution to the SCAG regional SCS. SCAG notes in the RTP/SCS that it has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the document, but it is unclear what the standing of the OC SCS is. The OC SCS contains a set of strategies agreed upon by local governments, agencies and other stakeholders within Orange County and should represent the SCS that is applicable to the Orange County region.

*Request:*

2. *Please revise the text in the last paragraph on page 106 to state: “These subregional SCS documents are incorporated into the regional SCS and represent the SCS for each of these subregions.”*

References to the RTP inducing growth – Several sections of the RTP/SCS state that it has the ability to affect the distribution of growth as well as induce growth (see page 80 under Population and Housing as an example). This is inconsistent with the “bottoms-up” approach SCAG undertook in the development of the documents wherein SCAG staff stated that they

would accept and use growth forecast data provided by local jurisdictions. The RTP/SCS is intended to incorporate the planned land use pattern that is expected to accommodate the projected future growth of this region as well as the planned transportation system that supports that growth. Therefore, growth is not induced, it is planned for. The document inaccurately implies a lack of coordination between land use and transportation entities.

*Request:*

- 3. Please amend text within the RTP/SCS, including the language on page 80, to remove the reference to the RTP and SCS inducing growth and replace it with language that acknowledges that the document reflects a land use pattern that accommodates the forecast growth for the region.*

**Comments on the Draft PEIR**

Intent of the PEIR to Serve as a Menu of Options – The draft PEIR includes mitigation and direction to the region that appears to overstep the requirements of SB 375 related to land use planning and applies a prescriptive set of mitigation measures to local agencies, project sponsors and other entities. A key principle of SB 375 is that it is not intended to supersede local agencies' authority to regulate land uses. Specifically, Government Code section 65080(b)(2)(K) states that “. . . Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. . . .” However, the language used in the PEIR appears to impose obligations on local agencies within the SCAG region, which is inconsistent with this law. It also appears to be inconsistent with SCAG staff's explanation that the PEIR and its mitigation measures are intended to provide a “toolbox” or menu of potential options for local agencies to use at their discretion.

Specifically, the draft PEIR on page 1-7 asserts that mitigation measures have been determined to be feasible and states that entities “can and should” implement the measures. These statements, in addition to the use of “can and should” in mitigation measures addressed at local agencies and project sponsors, imply that local agencies are obligated to implement and address the measures regardless of whether they deem the measures are feasible and applicable to a particular project. It is recognized that the “can and should” language is derived from CEQA; however, given the express limitation of SB 375 upon local agencies' land use authority, the language is inappropriate. Further, SCAG did not complete the Climate and Economic Development Project (CEDP) that was intended to analyze and provide documentation related to the feasibility and effectiveness certain strategies would have on the region. Because of the lack of information supporting the determinations of feasibility, it is inappropriate for the PEIR to make such an assertion.

*Requests:*

- 4. In order for the mitigation measures to truly be considered a toolbox of options for consideration by various entities in the SCAG region as intended, it is offered that all mitigation measures in the PEIR intended for entities other than SCAG be moved into an appendix to the PEIR and be renamed as sustainability strategies. These strategies could then be identified for consideration by lead agencies as mitigation for future projects*

*should a lead agency choose to do so and deem them applicable and feasible. The PEIR should only retain mitigation measures applicable to SCAG. The PEIR should not make any determination of the feasibility of the measures applicable to other entities, as this will be made by a lead agency. The Executive Summary, Introduction, and Project Description must also be updated to reflect the nature of the new appendix of sustainability strategies.*

Regardless of SCAG's acceptance of Request #4 above, the following comments are also provided:

5. *Due to the size of the SCAG region, it is not feasible for all potential projects undertaken within the SCAG region to be required to report to SCAG when mitigation measures in this PEIR are considered. Nor does it seem feasible for SCAG to accurately track the information in a meaningful way. Please clarify the obligations local agencies may have regarding SCAG's monitoring efforts. Specifically, clarify on Page 1-5 what the responsibilities of lead agencies are in regards to reporting to SCAG either use of or compliance with mitigation measures contained in the document.*
6. *Please provide the feasibility analysis on the mitigation measures included in the PEIR and incorporate as an appendix to the document.*
7. *Please amend the language in the first paragraph on page 1-5 to state: "Mitigation Measures proposed in this PEIR are available as tools for implementing agencies and local lead agencies to use, as they deem applicable. ~~can be incorporated as policies in the Final 2012-2035 RTP/SCS to help ensure that feasible mitigation measures are implemented at the project level.~~"*
8. *Please include language in the Executive Summary and in the certifying resolution for the PEIR explaining that the PEIR is intended to represent a menu of options available for consideration by local agencies and other entities at their discretion.*
9. *Please amend the language on page 1-7 under Mitigation Measures subheadings Transportation Project Mitigation and Land Use Planning and Development Project Mitigation to read: "The Draft PEIR includes a menu of possible mitigation measures that local jurisdictions, project sponsors, and other entities may implement as applicable and feasible. It is reasonable to assume that lead agencies, in their independent discretion, will implement measures which they determine to be applicable and feasible."*
10. *Please amend language in all mitigation measures identifying entities other than SCAG to state "~~can~~ and should consider where applicable and feasible."*

Policy Statements in the PEIR – The PEIR should not establish policy that has not been vetted in open and public forums. Most directly, page 2-3 of the Project Description, under the section Purpose and Need for Action, includes a bulleted list of policies that are not consistent with those included in the RTP/SCS. Additionally, many mitigation measures throughout the PEIR include an action and then, to give the action a direction, a policy statement follows that is inconsistent with or extends the policies in the RTP and SCS. For example, MM-TR 35 states: "Local jurisdictions can and should adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation." While the policy to "encourage the use of alternative transportation" is directly linked to the policies of both the RTP

and specifically, the SCS chapter, the policy statement to “discourage private vehicle use” is not and would establish additional policy.

*Requests:*

- 11. Please amend the bulleted list on page 2-3 to accurately reflect the actual policies and strategies included in the RTP and SCS as opposed to identifying new ones.*
- 12. Please delete or amend all mitigation measures that include policy statements that would establish policy not contained in the RTP/SCS. If policy statements are amended as opposed to being deleted, please ensure that the policy statements are consistent with stated policies in the RTP/SCS. For example, in MM-TR35, please amend the text to state: “Local jurisdictions ~~can and~~ should, where applicable and feasible, adopt a comprehensive parking policy that ~~discourages private vehicle use and~~ encourages the use of alternative transportation.” Attachment 2 identifies mitigation measures to delete or amend per this request. This list may not be exhaustive.*

CEQA Streamlining – One of the key components of SB 375 was the inclusion of incentives that provided CEQA streamlining for projects consistent with the objectives of the bill as well as consistent with the SCS. As identified on pages 1-10 through 1-12, for projects to qualify for these incentives, mitigation measures from the applicable environmental document must be incorporated into the project. It is not clear, however, which measures would need to be incorporated into a project for it to qualify, particularly in light of the intent of SCAG for the measures to be a toolbox.

*Request:*

- 13. Please clarify how the “menu of mitigation measures” from this PEIR is expected to be used by a lead agency or a project to qualify for the use of the CEQA streamlining provisions of SB 375.*

SCAG Authority – Several mitigation measures, listed in Attachment 3, identify actions that SCAG shall undertake to mitigate impacts of the plan. Many appropriately direct SCAG to provide a discussion forum or serve as a central data repository for a broad range of topics that affect the region as a whole. However, many others inappropriately direct SCAG to establish practices, standards, or policy in areas unrelated to SCAG purview within the RTP. SCAG’s authority is established by state and federal requirements regarding the RTP and its preparation. In recent years, its authority has been expanded by new state requirements contained in SB 375 that direct SCAG to consider the interaction between land uses and the transportation system in order to identify strategies that help meet state goals of reducing the cost of transportation infrastructure and reducing emissions of greenhouse gases from automobiles and light duty trucks that specifically result from the configuration of land uses. SCAG even stated in a Special Meeting of the Community, Economic and Human Development Committee on January 8, 2009, that SB 375 does not address green buildings, energy efficiency, municipal operation, waste management, water or technology of vehicles. The measures often appear to be directed at policy implementation that is under these other topics and is unrelated to the plan itself, such as implementing AB 32. Such measures will essentially require SCAG to establish policy in areas for which it has no authority.

Additionally, it is not clear how SCAG would fund the work efforts because they are not directly related to its mission and, therefore, do not have established funding. For example, MM-PS 118 states: "SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches and models and to specify levels of performance for regionally significant projects to be consistent with regional plans." Green building practices and energy efficiency measures are already addressed by various state and federal agencies, as well as by other local and regional organizations, and are not related to regional transportation planning or requirements under SB 375. Further, SCAG does not have the authority to specify levels of performance for land use or buildings.

SCAG's development of such policies could have significant effect on the region and its growth and development if they become adopted due to changes in CEQA and other state laws that require consideration of adopted regional plans. Policies that could have such an impact should not be established without sufficient means to develop and maintain them reflective of new laws, regulations, and data. Without authority and a permanent funding source to maintain such offsets of policies, it would not be efficient or effective for SCAG to develop them.

*Requests:*

14. *Please limit mitigation measures that are applicable to SCAG to those areas for which SCAG has purview.*
15. *Please clarify how the actions and programs required by the measures SCAG is tasked with would be funded to ensure that they are feasible for SCAG to undertake.*
16. *Please remove the mitigation measures listed in Attachment 3 that are applicable to SCAG and for which it does not have purview for under the law. Please note that this list may not be exhaustive.*

SCAG's Ability to Accomplish Mitigation Measures – SCAG has limited authority in many of the areas included in measures it will be required to undertake. As such, it will not be able to ensure impacts are mitigated and that the outcomes identified do actually occur. SCAG can assist, offer information, educate, and provide discussion forums for topics outside its area of jurisdiction; however, it is not possible to "ensure" that outcomes are achieved for projects and development that are outside of its authority.

*Request:*

17. *In order for mitigation measures to be achievable by SCAG, it is recommended that all references within mitigation measures indicating that SCAG will "ensure" or "shall minimize impacts" be removed or amended. The following is an example of the recommended changes:MM-CUL17: "~~Impacts to cultural resources shall be minimized through cooperation, information sharing, and~~ SCAG's shall, through cooperation, information sharing and ongoing regional planning efforts such as web-based planning tools for local government including CA lots, and direct technical assistance efforts such as Compass Blueprint's Toolbox Tuesday series, provide information and assistance to local agencies to help them avoid impacts to cultural resources. Resource agencies, such as the Office of Historic Preservation, shall be consulted during this process."*

Measures Suggesting New Fees or Taxes – Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation, provision of transit and more. Increases to fees or taxes are issues that could require voter approval may not be approved. It is more appropriate to include such actions as options to implement measures and that such options would be at the discretion and consideration of the lead agency.

*Request:*

*18. Please indicate in measures that any new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. Additionally, no assertion that these options are feasible should be made in the PEIR.*

Measures Duplicative of Existing Law – Many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the California Environmental Quality Act, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact.

Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and the regulation. Attachment 4 presents a list of many of the mitigation measures that reflect existing regulations.

*Request:*

*19. Please remove all mitigation measures which are duplicative of existing regulations administered by or under the jurisdiction of other agencies. Attachment 4 includes a list of such measures; however, the list may not be exhaustive.*

Prescriptive and Specific Mitigation in Measures – Many mitigation measures identify specific technologies or prescriptive actions to be undertaken, such as specifying use of Light Emitting Diode (LED) technology for streetlights or specifying setback standards. Because the PEIR covers a large region for a several year period, specifying such technology or a specific regulation could create future conflict if more energy efficient technology becomes available or if better strategies are identified. It would be more appropriate for the PEIR to use broader definitions in what should be included in the implementation of mitigation and provide lead agencies with more latitude in determining what is appropriate for each project.

*Requests:*

*20. Please delete or amend all mitigation measures that include specific technology or specify prescriptive actions that are under the purview of local agencies. For example, in MM-TR 23, it is recommended that the measure be amended to state: “Local jurisdictions ~~can and~~ should, where applicable and feasible, coordinate controlled*

*intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, local jurisdictions should, as applicable and feasible, require the use of a feasible, energy efficient Light Emitting Diode (LED) technology.*”

21. *Please delete mitigation measures or text within measures that is prescriptive, such as identifying the reduction of street widths to WWII widths or specifying building setbacks.*

### **Growth Forecast and Mapping**

(Comments in this section are applicable to both the RTP/SCS and the PEIR.)

The City of Anaheim actively participates and works with SCAG, OCCOG, OCTA, and the Center for Demographic Research (CDR) at Cal State Fullerton to ensure that GIS and socio-economic growth forecast data intended for use in regional planning, including the RTP/SCS accurately reflects the City’s land use pattern and expected growth.

Accuracy in all of these data sets is essential because these data are used throughout the region for a variety of transportation, growth, and air quality modeling that, in turn, is used to determine compliance with State and Federal regulation. With the passage of SB 375, these data carry the increased responsibility of demonstrating compliance the State goals to reduce greenhouse gas (GHG) emissions as well as directly linking the growth projections to State mandates relative to the Regional Housing Needs Assessment (RHNA). Because of the importance of these data, it is necessary for SCAG to utilize the most current and accurate data in the RTP/SCS and PEIR.

#### *Requests:*

22. *Please update all documents, tables, maps, narratives, modeling runs, and PEIR Alternatives (including the alternate referenced in the documents, including the PEIR, as C, 3, and Envision 2) that reference the Orange County growth forecasts with the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors and consistent with the subregional delegation Memorandum of Understanding between OCCOG, OCTA and SCAG.*
23. *Please ensure that all maps included in the adopted RTP/SCS and PEIR accurately reflect the City of Anaheim’s data, as submitted to SCAG between 2008 and 2011, for 2008 existing land use, zoning, general plan land uses, and the growth forecast.*

There is also a need to ensure that these data remain flexible. Because the RTP/SCS is adopted and in standing for 4 years, it is important to ensure that flexibility is built into the land use and growth forecast data so that it can accommodate the large number of land use changes that will occur in the SCAG region in each cycle. It is particularly important for those cities making land use changes consistent with the goals and policies of the RTP/SCS that are not consistent with the growth forecast at a small scale. To ensure this flexibility, the growth forecast should not be adopted at a small geographic scale such as at a city level or census tract.

#### *Request:*

24. *To ensure flexibility and reduce potential conflicts with local control in land use matters, it is requested that SCAG adopt the growth forecast data set at the county level and not at*

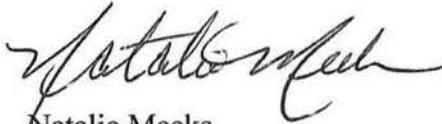
*a smaller geography such as a subregion, city, census tract, traffic analysis zone or other smaller geography.*

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

Sincerely,



Sheri Vander Dussen, AICP  
Planning Director



Natalie Meeks  
Public Works Director

svd:ts:sr

#### Attachments

cc: Doug Williford, Southern California Association of Governments  
Margaret Lin, Southern California Association of Governments  
Jacob Lieb, Southern California Association of Governments  
David Simpson, Orange County Council of Government  
Lacy Kelley, Association of California Cities – Orange County  
Natalie Meeks, City of Anaheim Public Works Department  
Steve Sciortino, City of Anaheim Public Utilities Department  
Marty DeSollar, City of Anaheim External Affairs

City of Anaheim  
**DEPARTMENT OF PUBLIC WORKS**



January 12, 2012

Chairman Thomas J. Umberg  
Board of Directors  
California High-Speed Rail Authority  
770 L Street, Suite 800  
Sacramento, California 95814

Subject: California High-Speed Rail - Draft 2012 Business Plan

Dear Chairman:

Thank you for the opportunity to review and comment on the Draft 2012 Business Plan for the California High-Speed Rail Project.

Attached to this letter are our comments on the Plan. Of particular interest is the proposed phased delivery approach for constructing the project, including the implementation of a blended approach allowing for existing rail service providers such as Amtrak, Metrolink, and Caltrain to provide much needed connectivity to the backbone of the high-speed rail system by sharing facilities and tracks. Implementing this approach in the most urbanized regions of the State (the Northern and Southern California "bookends" of the project) at the onset of the project, instead of the later phasing indicated in the Plan, is needed to enhance the passenger experience, reduce travel times, improve safety and provide critical connections to the existing passenger rail systems in these regions. It would also maximize the investment of State and Federal funds and ensure these critical improvements will be implemented. We therefore request your consideration of revising the project schedule to start this work at the onset of the project.

Thank you for your consideration of our comments. Should you have any questions, please contact me at 714-765-4530 or [NMeecks@anaheim.net](mailto:NMeecks@anaheim.net).

Sincerely,

Natalie Meeks  
Public Works Director

C: Bob Wingenroth, Interim City Manager  
Jamie Lai, Transit Division Manager  
Linda Johnson, Principal Planner  
Project File

H:\Engineering\ADMIN\LETTERS\TRANSIT\

**California High Speed Rail  
Comments on the Draft 2012 Business Plan**

Comment Number	Location in Document	Comments
1	Page 2-2 Exhibit 2-1	Exhibit 2-1. Full high-speed rail systems with connections – There will be Intercity Bus services at the Anaheim Regional Transportation Intermodal Center (ARTIC). Please add the Intercity Bus symbol to Anaheim on the exhibit.
2	Page 2-19	Blended operations to Los Angeles and Anaheim – Please modify the second to the last sentence in this paragraph as follows ( <b>bold</b> shows new word): “Anaheim <b>has</b> <del>will also have</del> connections to Amtrak’s Surfliners and the Metrolink commuter rail service.”
3	Page 3-5	San Francisco to Los Angeles/Anaheim (Phase 1) – Please change the end of the first sentence as follows: “and the <b>Anaheim</b> Regional Transportation <b>Intermodal</b> Center ( <b>ARTIC</b> ). <del>in Anaheim.”</del> ”
4	Page 8-10	The Plan discusses potential local agency contributions including cost-sharing, contribution of right-of-way and cooperative funding arrangements or revenues from innovative use of right-of-way/system facilities/equipment. Have discussions with the local agencies been conducted to ascertain the level of interest in these types of programs?
5	Page 10-19	Please revise this section as follows (words requested to be removed shown in <del>strikeout</del> , additional words in <b>bold</b> ):  “Anaheim – The Anaheim Station ( <del>ARTIC intermodal station</del> ) <del>is planned as part of the 20-plus million square foot Platinum Triangle redevelopment project, which is planned as an expansion of the Anaheim Regional Intermodal Transportation Center (ARTIC) located between Angel Stadium and Honda Center within the 820-acre Platinum Triangle. This area, located north of the confluence of Interstate 5 and State Route 57, is planned for development of nearly 19,000 residential units; 5 million square feet of commercial development; and, 14.5 million square feet of office development.</del> Currently, 15 projects are at or past the design stage totaling more than 8,000 residential units, 600,000 square feet of commercial space and 130 hotel rooms. The 17-acre portion of the Platinum Triangle in the <del>ARTIC zone</del> <b>Mixed Use District</b> is expected to be office-oriented with some retail and residential space, specifically allowing for 520 residential units, 2.2 million square feet of office space, and 360,000 square feet of retail. <del>Overall, the Platinum Triangle has momentum and is expected to continue regardless of HSR access.</del> One major attribute that the Anaheim Station and HSR ridership will benefit from is the concentration of recreational <b>and convention</b> destinations within close proximity to the station, including Disneyland <b>Park</b> , Disney’s California Adventure <b>and the Anaheim Convention Center in The Anaheim Resort</b> and <del>Angeles</del> the Angel Stadium, Honda Center <b>and the City National Grove of Anaheim in the Platinum Triangle. The City of Anaheim is also working cooperatively with the Orange County Transportation Authority as part of the Go Local Program on a proposed fixed-guideway project which would connect ARTIC with destinations in the Platinum Triangle and The Anaheim Resort.</b> ”
6	General Comment	Please consider revising the project schedule to implement the blended approach at the project “bookends” at the onset. This will ensure that available funding is maximized to complete critical connections in the most urbanized areas of the State at the earliest point.
7	General Comment	It is unclear whether the Project costs include the cost of improvements at ARTIC to accommodate high-speed rail services. It is also unclear whether the costs of all mitigation measures needed to implement the project are incorporated since the environmental document is still underway.
8	General Comment	Do the project costs reflect increases in electricity costs that could occur with implementation of AB32?

## Attachment 2

### Policy Statements to Delete or Amend in Mitigation Measures

Please amend the following mitigation measures (Reference Request #12, City of Anaheim Comments). This list may not be exhaustive.

- MM-BIO/OS 56
- MM-GEO 3
- MM-GEO 4
- MM-GHG 3
- MM-GHG 11
- MM-GHG 12
- MM-LU2 26
- MM-LU 41
- MM-LU 42
- MM-LU 47
- MM-LU 48
- MM-LU 51
- MM-LU 53
- MM-LU 56
- MM-LU 57
- MM-LU 60
- MM-LU 61
- MM-LU 65
- MM-LU 69
- MM-LU 71
- MM-LU 74
- MM-LU 75
- MM-LU 77
- MM-LU 80
- MM-LU 81
- MM-POP 1
- MM-PS 25
- MM-PS 41
- MM-PS 65
- MM-TR 21
- MM-TR 35
- MM-TR 42
- MM-TR 53
- MM-TR 65
- MM-TR 93
- MM-TR 96
- MM-W 65

### Attachment 3

#### Mitigation Measures Outside of SCAG Authority

Please amend the following mitigation measures (Reference Request #16, City of Anaheim Comments). This list may not be exhaustive.

- MM-BIO/OS 44
- MM-BIO/OS 45
- MM-BIO/OS 46
- MM-BIO/OS 48
- MM-GHG 3
- MM-GHG 8
- MM-GHG 11
- MM-LU 9
- MM-LU 21
- MM-LU 22
- MM-LU 24
- MM-LU 26
- MM-LU 32
- MM-LU 34
- MM-LU 41
- MM-LU 42
- MM-LU 47
- MM-LU 48
- MM-LU 51
- MM-LU 53
- MM-LU 56
- MM-LU 57
- MM-LU 60
- MM-LU 61
- MM-LU 64
- MM-LU 65
- MM-LU 69
- MM-LU 71
- MM-LU 74
- MM-LU 75
- MM-LU 77
- MM-LU 80
- MM-LU 81
- MM-LU 82
- MM-LU 83
- MM-NO 12
- MM-NO 16
- MM-POP 1
- MM-PS 3
- MM-PS 14
- MM-PS 25
- MM-PS 37
- MM-PS 39
- MM-PS 67
- MM-PS 68
- MM-PS 71
- MM-PS 95
- MM-PS 118
- MM-PS 121
- MM-TR 17
- MM-TR 23
- MM-TR 28
- MM-TR 35
- MM-TR 83
- MM-TR 85
- MM-TR 96
- MM-W 34
- MM-W 59
- MM-W 60
- MM-W 65

## **Attachment 4**

### **Mitigation Measures Duplicative of Existing Regulation**

Please delete the following measures (Reference Request #19, City of Anaheim Comments).  
This list may not be exhaustive.

#### **Air Quality Regulation, some through the Air Districts**

- MM-AQ1
- MM-AQ2
- MM-AQ3
- MM-AQ4
- MM-AQ5
- MM-AQ6
- MM-AQ7
- MM-AQ8
- MM-AQ9
- MM-AQ10
- MM-AQ11
- MM-AQ12
- MM-AQ13
- MM-AQ14
- MM-AQ17
- MM-AQ18

#### **Regulation Related to Habitat and Endangered Species**

Typically regulated by the California Department of Fish and Game and/or the federal Fish and Wildlife Service.

- MM-BIO/OS1
- MM-BIO/OS3
- MM-BIO/OS4
- MM-BIO/OS8
- MM-BIO/OS10
- MM-BIO/OS11
- MM-BIO/OS17
- MM-BIO/OS18
- MM-BIO/OS21
- MM-BIO/OS22
- MM-BIO/OS23
- MM-BIO/OS24
- MM-BIO/OS25
- MM-BIO/OS26
- MM-BIO/OS27
- MM-BIO/OS28
- MM-BIO/OS14
- MM-BIO/OS7

#### **Regulated by Water Quality Review Boards (NPDES)**

- MM-AQ16
- MM-BIO/OS19
- MM-GEO5
- MM-W1
- MM-W13
- MM-W58

#### **Regulated by Federal National Flood Insurance Program**

- MM-HM8

#### **Local Agencies**

- MM-AV11

Attachment 4 (continued)

Regulated by Federal and State Laws and from Resource Agency Programs

- |               |           |            |           |          |
|---------------|-----------|------------|-----------|----------|
| • MM-AV3      | • MM-HM3  | • MM-PS1   | • MM-TR29 | • MM-W38 |
| • MM-AV6      | • MM-HM4  | • MM-PS2   | • MM-TR33 | • MM-W39 |
| • MM-AV12     | • MM-HM5  | • MM-PS4   | • MM-TR49 | • MM-W43 |
| • MM-BIO/OS20 | • MM-HM6  | • MM-PS8   | • MM-TR55 | • MM-W46 |
| • MM-BIO/OS29 | • MM-HM7  | • MM-PS10  | • MM-TR75 | • MM-W47 |
| • MM-BIO/OS30 | • MM-HM9  | • MM-PS12  | • MM-TR89 | • MM-W48 |
| • MM-BIO/OS31 | • MM-HM10 | • MM-PS13  | • MM-W6   | • MM-W49 |
| • MM-BIO/OS32 | • MM-HM11 | • MM-PS14  | • MM-W8   | • MM-W50 |
| • MM-BIO/OS33 | • MM-HM12 | • MM-PS16  | • MM-W9   | • MM-W51 |
| • MM-BIO/OS34 | • MM-HM13 | • MM-PS35  | • MM-W10  | • MM-W52 |
| • MM-BIO/OS35 | • MM-HM14 | • MM-PS36  | • MM-W11  | • MM-W54 |
| • MM-BIO/OS50 | • MM-HM15 | • MM-PS37  | • MM-W12  | • MM-W55 |
| • MM-BIO/OS51 | • MM-HM16 | • MM-PS42  | • MM-W15  | • MM-W56 |
| • MM-CUL1     | • MM-LU10 | • MM-PS43  | • MM-W16  | • MM-W61 |
| • MM-CUL2     | • MM-LU11 | • MM-PS48  | • MM-W17  | • MM-W62 |
| • MM-CUL3     | • MM-LU17 | • MM-PS55  | • MM-W18  | • MM-W64 |
| • MM-CUL4     | • MM-LU14 | • MM-PS56  | • MM-W19  | • MM-W66 |
| • MM-CUL5     | • MM-LU19 | • MM-PS57  | • MM-W20  | • MM-W68 |
| • MM-CUL6     | • MM-LU20 | • MM-PS59  | • MM-W21  |          |
| • MM-CUL7     | • MM-LU28 | • MM-PS61  | • MM-W22  |          |
| • MM-CUL8     | • MM-LU30 | • MM-PS67  | • MM-W23  |          |
| • MM-CUL9     | • MM-LU38 | • MM-PS69  | • MM-W24  |          |
| • MM-CUL10    | • MM-LU43 | • MM-PS71  | • MM-W25  |          |
| • MM-CUL11    | • MM-LU44 | • MM-PS73  | • MM-W26  |          |
| • MM-CUL12    | • MM-LU48 | • MM-PS77  | • MM-W27  |          |
| • MM-CUL13    | • MM-LU58 | • MM-PS89  | • MM-W28  |          |
| • MM-CUL15    | • MM-NO1  | • MM-PS92  | • MM-W29  |          |
| • MM-CUL16    | • MM-NO4  | • MM-PS97  | • MM-W30  |          |
| • MM-GEO1     | • MM-NO8  | • MM-PS107 | • MM-W31  |          |
| • MM-GEO2     | • MM-NO9  | • MM-PS113 | • MM-W32  |          |
| • MM-GEO3     | • MM-NO18 | • MM-PS119 | • MM-W36  |          |
| • MM-GEO4     | • MM-POP2 | • MM-PS122 | • MM-W37  |          |
| • MM-GEO6     | • MM-POP4 |            |           |          |



*Southern California's Leading Transit Advocacy Group*

P.O. Box 567 \* San Fernando, CA 91341-0567

Voice: 818.362.7997 \* Fax: 818.364.2508

[www.transitcoalition.org](http://www.transitcoalition.org)

The Transit Coalition (a project of LACBC) is a nonprofit public charity exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code

**Tuesday, February 14, 2012**

**Southern California Association of Governments  
Attention: Margaret Lin  
Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017-3435**

**RE: Comments on SCAG DRAFT 2012 RTP and the Plan EIR**

**Dear Ms. Lin:**

**We wish to express our concerns on elements of the draft SCAG RTP, as we don't see the AB32 and SB375 goals being achieved, without some modifications to the document, as our comments outline.**

**Identify the Measure R Van Nuys and Sepulveda Pass transit projects as corridors rather than designating them as 'busways,' which could improperly preempt and prejudice the environmental clearance process. Note that neither Measure R nor Metro have chosen the mode for either corridor; "Rapidways" describe rapid transit corridors regardless of mode.**

**Converting existing High Occupancy Vehicle (HOV) carpool lanes to High Occupancy Toll (HOT) must allow carpools to have access to these lanes free of charge and without mandatory transponders. Otherwise, the intent of the RTP/SCS will be undermined and its outcome will underperform the potential of these lanes due to a reduction in both the number of carpools and the average number of passengers per vehicle.**

**Converting loading and unloading activities at the ports to direct ship to rail (excluding any intermediate truck sorting steps) will enable greater capacity at lower cost and environmental impact. Creation of a freight pipeline from the Ports to the Inland Empire with an underground alternative to the 60 Truck Freightway should be an alternative.**

**In addition to a regional gas tax for transportation, SCAG should implement a diesel fuel tax that accounts for both the wear and tear on roadways as well as pollution. Receipts from both taxes should be kept together in a regional transportation matching fund.**

**We recommend that you include these modifications in the RTP.**

**Sincerely,**

**Bart Reed  
Executive Director**

**San Bernardino RTP Public Hearing**

*January 18, 2012*

Comment Cards:

- 1. R.A. "Barney" Barnett**  
**High Grove Municipal Advisory Council**  
Speak under public comments
- 2. Stephen Rogers**  
**Redlands resident**  
See attached letter re: CEQA Scoping Meeting for Downtown San Bernardino Passenger Rail Project dated May 27, 2011
- 3. David Reid**  
**Colton resident**  
Please finish Santa Ana bike trail
- 4. Evelyn Trevino**            **phone: 909.387.4369**            **e-mail: etrevino@dph.sbcounty.gov**  
**San Bernardino County Department of Public Health**  
[There was no comment noted on the comment card]
- 5. Pauline Chow, Esq.**  
**Safe Routes to School National Partnership**  
Per 2009 National Household Travel Survey, 21 percent of all trips in the SCAG region are currently being done via walking and bicycling. And tragically, per SCAG 2012 Draft RTP, 25 percent of all roadway fatalities in the SCAG region are pedestrians and bicyclist. The RTP/SCS provides 1.3% of its funding to active transportation. 80% of the 1.3% funding - 6 billion dollar - is not funded until after 2025. Communities will not see the benefits of walking and bicycling to school, work, and play for at least 13 years.

I am a resident of Upland, San Bernardino County, CA and enjoy using the Pacific Electric Trail and Bike lanes, where they exist. However, safety for pedestrians and bicyclists in my city is a huge problem. The last couple of mile to my destination from the Pacific Electric Trail is where I feel unsafe and a target for injury....or even death. This region has great resources and with a little more effort, it can develop the infrastructure for adequate active transportation.

Regards,  
Pauline Chow, Esq.  
Southern California Regional Policy Manager  
Safe Routes to School National Partnership

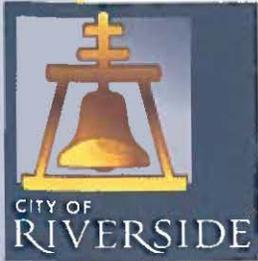
**6. Terry Roberts**                    *phone: 909.884.5864*  
**American Lung Association in California**

### **Key Health Recommendations for SCAG SCS**

The Southern California Association of Governments (SCAG) Sustainable Communities Strategy offers a transformative opportunity to reduce unhealthy vehicle emissions while promoting healthier, more active neighborhoods with reduced rates of chronic disease and premature death.

Health professionals support strengthening the Sustainable Communities Strategy to improve health outcomes from healthy land use and transportation planning with the following recommendations:

- **Increase active transportation investments to more than \$10 billion a year.** A recent study by the Los Angeles County of Public Health estimated that \$40 billion would be needed to build out all of the current bicycle and pedestrian projects in Los Angeles County alone. Analysis needed of how SCAG's bicycle and pedestrian per capita investment compares with other regions.
- **Assess health benefits through new modeling approaches:** Utilize the new California Department of Public Health screening tool to analyze the potential chronic disease reductions in the SCAG region from increased physical activity such as walking and biking and complete this information as soon as possible.
- **Broaden the list of public health targets** for the SCS to include reductions in air pollution related health impacts, including premature mortality and asthma exacerbations. Work with public health agencies to develop other public health targets.
- **Focus investments on completing transit systems** and building out transit infrastructure, rather than highway expansion.
  - Doubling Metrolink ridership by 2020 and double it again by 2035
  - Expanding Bus Rapid Transit and regional bus service
  - Enhancing TOD planning and 1<sup>st</sup>-mile-last-mile investments near Metrolink stations
  - Doubling the bicycle network to 24,000 miles and improving pedestrian environment
- **Front load active transportation funding**, including transit, so that projects are completed early in the 25-year RTP process.
- **Increase investments in zero emission freight transportation** in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards.
- **Evaluate the number and type of new developments** that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP. Work with air district, health departments and universities to develop best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.



Community Development  
Department  
Planning Division

February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Jacob Lieb  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**SUBJECT: NOTICE OF AVAILABILITY (NOA) OF DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN (RTP)/SUSTAINABLE COMMUNITIES STRATEGY (RTP/SCS) AND DRAFT 2011 FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM AMENDMENT #11-24 (FTIP) AND DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE 2012 – 2035 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRATEGY**

Dear Ms. Lin and Mr. Lieb:

Thank you for the opportunity to comment on the two Notices of Availability (NOA) for the above noted projects. As a member organization of the Southern California Association of Governments (SCAG), the City of Riverside has been and continues to participate in the development of the RTP and SCS including reviewing and providing input on the documents and the Draft PEIR. City staff is aware of the hard work that has resulted in these two documents and commends SCAG for preparing a forward thinking plan for our region, where 1 in 17 Americans live and 40 percent of all shipping containers west of the Mississippi River enter the country through the ports of Los Angeles and Long Beach.

On February 8, 2012, SCAG staff graciously held a teleconference meeting with the Planning Directors Technical Advisory Committee of the Western Riverside Council of Governments (WRCOG). During the teleconference meeting, many of City staff's questions were answered. However, some unanswered questions remain and need to be addressed due to the importance of the RTP/SCS and the SCS's connection to Compass Blueprint funding and CEQA streamlining advantages, both stemming from SB 375 and SB 226 for cities whose general plans are consistent with the SCS.

For these reasons City staff has the following questions concerning the documents:

1. The SCS includes projected land use patterns for 2035 using High Quality Transportation Corridors. In the City of Riverside, this includes Bus Rapid Transit (BRT) and Metrolink Lines similar to the City's General Plan 2025. However, the land use patterns in the SCS were applied at the Transportation Analysis Zones (TAZ), which incorporate large areas of land that may contain drastically varying land uses or developable land. Using this map for consistency with the City's General Plan 2025 would be very problematic. For instance, maintaining land use consistency between the General Plan and the prescribed TAZ map along the Alessandro Boulevard BRT corridor would force the City to direct growth to areas such as the Sycamore Canyon Wilderness Park (a natural open space conserved by the County Multiple Species Habitat Conservation Plan) and along hillsides and arroyos, which have already been developed to their maximum density based upon their natural characteristics. The area near the La Sierra Metrolink Station is another part of the City where increasing density using the prescribed TAZ map would result in directing density into a protected area. The City's

Greenbelt, a protected agricultural area which lacks the infrastructure to support the proposed density, encompasses a large section of the City in this area and would be impacted by the proposed growth. Other specific comments related to the proposed TAZ map are as follows:

- a. Generally, the SCS map is in conformance with the City's General Plan 2025 and its intent. However, using TAZ's rather than parcels and following the logistics of the City's natural characteristics causes some problems in creating General Plan consistency.
  - b. Page 148 of the RTP/SCS describes how consistency within a TAZ can be averaged. However, the projected growth in some of the TAZ's located within the City of Riverside is not feasible due to various constraints, including a lack of infrastructure, habitat conservation efforts, and topography. The City's General Plan accounts for these constraints and is consistent with the overall intent of the SCS, however it directs density to where it is appropriate along these same corridors. This is consistent with Smart Growth principles, which advocate for protecting sensitive open space areas and placing density in urban areas where infrastructure already exists.
  - c. The City aims to be consistent with the SCS but cannot achieve this at the TAZ level. Is there another option? Especially since the City's General Plan 2025 currently meets the overall intent of the SCS, but does so based upon the City's natural characteristics.
2. Socio-economic Data for Riverside County was revised by SCAG based upon the 2010 Census. These revisions were presented to the Executive Committee of WRCOG and approved in December of 2011. Will the plans and Draft PEIR be updated to reflect this new information?
  3. Page 3.13-25 of the Draft PEIR, Table 3.13-6 incorrectly reflect data on the City of Riverside Wastewater Plant. This data should be updated to reflect that the City's Plant has a current flow of 34 mgd with a capacity flow of 40 mgd and will have a capacity flow of 52 mgd by 2035.

The City is deeply concerned about being able to meet consistency with the SCS in order to take advantage of Compass Blueprint Programs and CEQA streamlining provisions in the future. The current draft, unfortunately, creates conflicts with the City's existing land uses. SCAG's equal commitment to this goal for all cities would be deeply appreciated.

Should you have any questions regarding this letter, please contact Gus Gonzalez, Associate Planner, at (951) 826-5277 or by email at [ggonzalez@riversideca.gov](mailto:ggonzalez@riversideca.gov).

Sincerely,



Steve Hayes, AICP  
Interim City Planner

- c: Ronald Loveridge, Mayor  
Riverside City Council Members  
Scott Barber, City Manager  
Belinda Graham, Assistant City Manager  
Deanna Lorson, Assistant City Manager  
Kristi Smith, Supervising Deputy City Attorney  
Anthony Beaumon, Deputy City Attorney  
Dan Chudy, Interim Community Development Director  
Tom Boyd, Interim Public Works Director/City Engineer  
Steve Libring, Traffic Engineer  
Rick Bishop, Executive Director, WRCOG, 4080 Lemon Street, 3<sup>rd</sup> Floor, MS1032, Riverside, CA 92501-3679

February 14, 2012

www.kennedycommission.org  
17701 Cowan Ave., Suite 200  
Irvine, CA 92614  
949 250 0909  
fax 949 263 0647

Attn: Honorable Pam O'Connor, President of SCAG  
Regional Council Members  
Southern California Association of Governments (SCAG)  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

**RE: Comments on SCAG's Draft 2012 RTP/ SCS**

Dear Honorable O'Connor,

The Kennedy Commission (the Commission) is a broad based coalition of community organizations and advocates that focus on building sustainable communities through the creation of affordable home opportunities for families earning less than \$20,000 annually in Orange County.

The Commission would like to acknowledge the extensive work that the Regional Council and staff of the Southern California Association of Governments (SCAG) have done to embark on the development of a first-ever Sustainable Community Strategy (SCS) in the 2012 Regional Transportation Plan (RTP). The RTP/SCS is moving in the right direction as it provides land-use, transportation and housing strategies that will achieve and exceed the greenhouse gas emission reduction targets set by the California Air Resources Board (CARB).

The implementation of the RTP/SCS will create more sustainable and healthier communities in the SCAG region, however, the Commission believes the strategies linking housing and transportation can be strengthened to facilitate the development of affordable homes. Locating homes, specifically affordable homes, near accessible public transportation, job centers and neighborhood amenities will allow individuals to afford to live in the same community in which they work in. This type of planning will effectively address the goals of SB 375 and decrease long distance commutes, vehicle miles traveled (VMT) and highway congestion that all leads to greenhouse gas emissions.

The Commission would like to comment on the following:

**Integrating Affordable Homes Near Job Centers and Transportation Hubs**

The RTP/SCS identified High-Quality Transit Areas (HQTA) in the region as opportunity planning areas for the majority of future housing and employment growth. It is projected that by the year 2035, 51 percent of new homes and 53 percent of new employment growth will be developed in HQTA.<sup>1</sup> While the HQTA encourages higher density and compact development near and around job centers and transit amenities, this type of development does not necessarily

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<sup>1</sup> Regional Transportation Plan 2012 RTP Sustainable Communities Strategy Towards a Sustainable Future, p. 128, December 2011.

facilitate the development of affordable homes throughout the SCAG region. While there are several jurisdictions that have initiated urban infill or transit-oriented developments, many of these housing developments have been planned or developed to provide housing opportunities affordable to higher income households. These developments lack mixed-income housing opportunities that would be available to many working families, especially lower income families, who want to live and work in the City.

While future growth in HQTAs reflects the emerging demographic trends and is the recommended major land use scenario, the RTP/SCS acknowledges that there are potential impacts of displacement of lower income households and gentrification resulting from new transit oriented developments that attract affluent residents in the neighborhood. The Commission recommends that SCAG closely analyze, monitor and mitigate any potential impacts or environmental justice inequalities stemming from future development. In addition, the Commission strongly supports SCAG's land use and housing mitigation measures to help reduce these impacts:

- **MM-LU11:** Significant adverse impacts to community cohesion resulting from the displacement of residences or businesses can and should be mitigated with specific relocation measures as dictated by local, state or federal requirements on a project-by project basis. Such measures include assistance in finding a new location, assistance with moving, or compensation for losses. Where it has been determined that displacement is necessary and displaced individuals are eligible, a relocation assistance program consistent with the State Uniform Location Assistance and Real Properties Acquisition Policies Act provides compensation and assistance in finding new residence for displaced individuals.<sup>2</sup>
- **MM-LU53:** SCAG shall promote infill, mixed-use, and higher density development, and provide incentives to support the creation of affordable housing in mixed use zones.<sup>3</sup>
- **MM-LU61:** Local jurisdictions can and should mix affordable housing units with market rate units as opposed to building segregated affordable housing developments.<sup>4</sup>
- **MM-LU73:** Local jurisdictions can and should locate affordable housing in transit-oriented development whenever feasible.<sup>5</sup>

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<sup>2</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-17, December 2011.

<sup>3</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-21, December 2011.

<sup>4</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-22, December 2011.

<sup>5</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.8-23, December 2011.

- **MM-POP4:** Project sponsors shall mitigate impacts to affordable housing as feasible through construction of affordable units (deed restricted to remain affordable for an appropriate period of time) or payment of any fee established to address loss of affordable housing.<sup>6</sup>

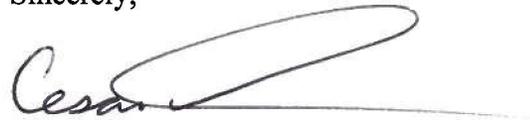
### **Jobs-Housing Fit Performance Measure**

On the June 30, 2011 SCAG Environmental Workshop, participants commented on the need for a performance measure such as a jobs-housing fit analysis in the RTP/SCS.<sup>7</sup> This analysis would evaluate the types of jobs being created in the community to the housing types and affordability levels of homes being developed. The RTP/SCS has instead provided a performance measure on jobs-housing imbalance or jobs-housing mismatch that analyzes the socio-economic profiles of long distance commuters.<sup>8</sup> This is a small step towards the right direction but the Commission recommends there needs to be more research and thorough analysis, specifically on the jobs-housing fit, to provide a better understanding of how we can strengthen the link between jobs and housing development for all economic segments of the community.

The Kennedy Commission looks forward to working with SCAG Regional Council and staff to achieve our mutually beneficially goals in creating more sustainable, healthier and equitable communities. Specifically, the Commission welcomes the opportunity to continue our dialogue that will result in the production of new homes affordable to extremely low, very low and low-income households throughout the region.

If you have any questions, please feel free to contact me at (949) 250-0909 or [cesarc@kennedycommission.org](mailto:cesarc@kennedycommission.org).

Sincerely,



Cesar Covarrubias  
Executive Director

cc: Hasan Ikhata, SCAG

---

<sup>6</sup> Draft Program Environmental Impact Report, 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy, p. 3.10-11, December 2011.

<sup>7</sup> Regional Transportation Plan 2012 RTP Sustainable Communities Strategy Towards a Sustainable Future, Environmental Justice, p. 4, December 2011.

<sup>8</sup> Regional Transportation Plan 2012 RTP Sustainable Communities Strategy Towards a Sustainable Future, Environmental Justice, p. 4, December 2011.

Mr. Hasan Ikhata, Executive Director  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

February 14, 2012

RE: City Comments on the Draft SCAG 2012 Regional Transportation Plan (RTP)  
and Sustainable Communities Strategy and Program Environmental Impact  
Report; Support for RTP Project List and the 710N Gap Closure Project

Dear Mr. Ikhata,

We are pleased to join with METRO in complimenting SCAG not only for its fine work on this far reaching document, but for its unprecedented outreach process. Both lend themselves to the success of the RTP.

We note that METRO, in its written communication to SCAG, stated that all of its projects which are in the Los Angeles County Long Range Plan (LRP) are also in the SCAG RTP. We acknowledge and support the LRP, and now the RTP, which includes all the Measure "R" transit and highway projects, with identified funding sources for each.

We further join with and support the complimentary comments of the City of Los Angeles which state, in its communication to you that, with a few minor exceptions, that the RTP is satisfactory to the City.

All of us are grateful for the Los Angeles County voter mandate known as Measure "R", now passed into law and being actively implemented. It is safe to say that without "Measure R" most all of our sorely needed transportation projects may not have seen a shovel raised to move the first piece of dirt.

"Measure R" provided certain amounts of money for specific projects. The 710N Gap Closure Project was named in the law and was allocated over 700 million dollars. We concur with SCAG and our other regional and city partners that the 710N Gap Closure Project is appropriately designated a "constrained project" in the 2012 RTP Constrained Plan and, further, that the 710N Gap Closure Project has met all the federal requirements for inclusion in said Plan. Attempts to say otherwise will be vigorously refuted by all parties.

Measure R was a mandate of the voters of Los Angeles County to fix the traffic problems and to clean up the air. The 710N Gap Closure was a significant part of the voter mandate, and efforts are now underway to fulfill that mandate. In fact, METRO is engaged in an EIR/EIS process right now at the project level. Any and all outstanding gap closure issues and the environmental impacts of which

Alhambra Draft RTP Comments

February 14, 2012

Page 2

transportation mode type (or combination of modes) should be used to close the gap will be answered within the next 30 months.

Two things are clear from the many 710N Gap studies prior to the current EIR/EIS effort: there is no proposed project in the SCAG region which reduces traffic congestion more than the completion of the 710 Gap, and there is no proposed project in the SCAG region which reduces air pollution more than the 710 Gap. The project is vital to many more than those who live in the area. It is vital to the conformity issue between the Transportation Plan and the Air Quality Plan.

We continue to join with those who have supported the Completion of the 710 Gap at METRO and as proponents of the closure of the Gap: US Congressperson Judy Chu, Senator Bob Huff, Assemblyman Cedillo, Assemblyman Mike Eng, SCAG, Independent Cities, San Gabriel Valley Council of Governments, Pasadena (by virtue of an imitative ordinance requiring support of the completion of the Gap), San Gabriel Valley Economic Partnership, 710 Freeway Coalition, Polling data: 710 completion, Supporters of the completion of the Gap, the vote of the CTC Public Infrastructure Advisory Committee supporting the project, the City of Rosemead, the City of San Gabriel, the City of San Marino the city of Monterey Park, El Serreno, and the City of Glendale among others. Support runs as high as 7 to 1.

While it may be tempting to trace the history of the project (actually going back as far as 1933), surely most everyone involved knows that history. The injustice occasioned on many is known; less recognized is why the injustice occurred and how our entire region has truly suffered over such a long period of time. The few still seem to believe that it is all right to harm the many.

In conclusion, the City of Alhambra joins with the voters of Los Angeles County and all our partners in looking forward to the day in the foreseeable future when the 710N Gap Closure will be a reality. We are proud to be a part of the Southern California Region and thank SCAG for producing an RTP we can all be proud of.

Sincerely,

Leland C. Dolley  
City Of Alhambra  
Special Counsel  
310 545 3078



February 14, 2012

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

Re: Comments on the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy, and Program Environmental Impact Report

Dear Mr. Ikhata:

NAIOP, the Commercial Real Estate Development Association, is the leading organization of developers, owners, and related professionals in office, industrial and mixed use real estate. The over 900 members of the NAIOP SoCal Chapter serve Los Angeles and Orange Counties, and is the premier commercial real estate organization in Southern California. We have been actively involved in the development of the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), along with the review of the just released Program Environmental Impact Report (PEIR).

NAIOP SoCal fully understands the enormity of the undertaking to create the RTP, particularly with the newly required SCS being added to the effort. We commend SCAG for its efforts to make the RTP/SCS as much of a bottoms-up process as possible. We particularly thank SCAG for incorporating the Orange County LRTP and SCS developed by the Orange County Transportation Authority (OCTA) and the Orange County Council of Governments (OCCOG) respectively. NAIOP believes that is a model for all SCAG subregions to embrace in any future RTP/SCS. We fully support what OCTA and the OCCOG have submitted, and also incorporate by reference as though fully set forth herein their comments on the RTP/SCS and PEIR. That same broad participatory process and effort should also have been made in the drafting of the PEIR, but was not. Hopefully that can be changed in the future so as to avoid many of the issues that have arisen.

Our major concerns surround the PEIR. The 642 page complex document with approximately 550 supposed mitigation measures was released the afternoon of Friday December 30, 2011, right before the New Year's holiday weekend. Thus, no one really could look at it until January 3, 2012, losing 3 days of the brief 45-day review period. A tremendous effort, and cost, has been undertaken to try to meet the February 14 end of comment period. It is very obvious the comment period for the PEIR is not sufficient to allow for a thorough, thoughtful analysis of the very belatedly released PEIR. Unfortunately, SCAG has repeatedly

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Cynthia G. Fusco, Executive Director  
Vickie Talley, Director of Legislative Affairs

indicated they would not extend the comment period. NAIOP does request that the comment period be extended.

To compound the problem, the PEIR is going to be rushed to approval. NAIOP has worked closely with many organizations throughout Southern California, and it is very apparent SCAG will be receiving numerous comments. Yet, the schedule is to hold a joint Policy Committee hearing on March 21 to gain their recommendation that the RTP/SCS and PEIR be approved, which is 5 days before the response to comments will be released on March 26. Then, the Regional Council is supposed to approve all the documents on April 4. SCAG has, again unfortunately, ruled out any delay in this schedule as well as specifically saying they will not make any changes to the PEIR that would require a recirculation. This incredibly rushed schedule with predetermined lines in the sand as to the length of the comment period and timing of the actual approval does not provide the time for the appropriate review of these complex documents, any real analysis of the comments that will be supplied, and specifically eliminates any valid modification to the RTP/SCS or PEIR. It leads one to question whether there has been a legally questionable predetermined outcome.

Turning to the substance of the documents. There is a blanket statement that all the mitigation measures are feasible and effective. Yet, there is no discussion or analysis to support such a statement. Furthermore, SCAG goes on to claim that local jurisdictions and project sponsors “can and should” perform the mitigation measures. While SCAG has claimed the mitigation measures are supposed to be a “tool-box” to choose from, the actual verbiage of the documents does not so indicate. The statement of the feasibility, efficiency, and “can and should” language should be deleted. Furthermore, SCAG should at a minimum clearly state that the PEIR sets forth a menu of options for the local jurisdictions and project sponsors to choose from, and that it is up to the local jurisdictions and project sponsors to determine what is feasible and efficient. This could effectively be done by separating all the mitigation measures that are applicable to SCAG, and put all the “tool-box” suggestions into a separate document indicating the above so SCAG’s stated intention is clear to all.

Next, there are nearly 200 “mitigation measures” that are incomplete references to Federal, State, and Local law, and various regulatory measures. These are matters that project sponsors are already legally required to perform. Once all of the legal requirements are performed, then the CEQA process analyzes if there are any environmental impacts that need to be mitigated. Thus, the legal requirements are actually in the baseline, and are not used as mitigation measures. By trying to reword the legal requirements and call them mitigation measures can cause great confusion and legal concerns. Since the legal requirements are already in the project, do these so-called “mitigation measures” in the PEIR refer to something different, something new, something additional? All references to legal and regulatory requirements should be deleted. If SCAG feels there is some need to remind local jurisdictions and project sponsors to comply with the law, this can easily be done with one statement in the RTP, not the PEIR, indicating they should comply with all applicable laws and regulations.

NAIOP appreciates SCAG’s interest in being a forum for discussion of issues that may be impacting the Southern California area. Forum discussions can lead to ideas that can be fully analyzed by the appropriate agencies. But, SCAG does not need to try to be the one to implement or oversee such ideas. There are many governmental agencies and regulatory bodies that already have the authority to cover a variety of issues, and SCAG should not intervene in matters already under the purview of other governmental agencies. SCAG, as all MPOs, is a federally created organization whose focus is on transportation efforts. Congress wanted MPOs to ensure that federal transportation funds were utilized through a cooperative and comprehensive planning process. The core function of MPOs is to evaluate the transportation issues in a region, and develop realistic options. Involving the public, MPOs are to

develop long range transportation plans and transportation improvement programs that promote a multi-modal transportation system. The RTP should solely be focused on that objective, and the SCS is only to fit the requirements of SB 375. Yet, the documents go in to things such as paleontology, wastewater, utilities, and many other areas that are beyond SCAG's scope. There are numerous areas in the PEIR where SCAG claims it will "ensure" certain outcomes. This is not SCAG's role, and the entire issue of not intervening in other agencies domains is needs to be addressed in any final RTP/SCS and PEIR.

The funding for the RTP is also of great concern. Federal law does require that the plans be fiscally constrained such that any funding is available or reasonably expected to become available. Yet, the draft RTP claims to be an approximate \$524 billion program, but has a shortfall of \$219 billion in revenues; nearly half. There is a reference to about \$127 billion of the shortfall being reliant on major State and/or Federal actions, which seem awfully speculative. NAIOP has a major concern over the numerous references in the documents to pushing local jurisdictions to adopt new fees or taxes. The commercial/industrial development industry is already heavily burdened with fees from many, many regulatory agencies and jurisdictions. We often hear that some new fee is not that big, or is for a great cause. Yet, the net effect is a mountain of "little fees". Sort of a death by a thousand fees. To make up billions and billions of revenue shortfall would necessitate extensive new fees and taxes. This would clearly be a huge hinderance, if not paralyze, any type of economic recovery in the regions. NAIOP did not see any type of analysis in the documents that would lead one to believe such fee and tax increases are reasonably possible, especially in light of Proposition 22, nor an analysis of the economic impacts. Such analyses are needed before any of the documents are finalized.

The RTP/SCS and PEIR are incredibly complex documents that are very important and far-reaching. NAIOP SoCal has made on effort to evaluate the very voluminous materials. Yet, in the compressed timeline, it has been impossible to touch on every area of concern. The above highlights some of the major issues. We will continue to evaluate the material and follow the efforts to revise the RTP/SCS and PEIR so that the final product is credible and truly benefits all of Southern California. NAIOP SoCal looks forward to SCAG's responses to the above comments and the request to extend the comment period. We request to be included in any conversations regarding the necessary revisions to the RTP/SCS and PEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "James V. Camp". The signature is fluid and cursive, with a large initial "J" and "C".

James V. Camp  
Director  
Chair, Legislative Affairs Committee



February 14, 2012

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

**Subject: CVAG and WRCOG Comments on the Draft 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS)**

Dear Mr. Ikhata:

On behalf of the Coachella Valley Association of Governments (CVAG) and the Western Riverside Council of Governments (WRCOG), we commend SCAG for its undertaking of an update to the Regional Transportation Plan (RTP), and for preparing the region's first Sustainable Communities Strategy (SCS) pursuant to SB 375. CVAG and WRCOG are taking this opportunity to express our collective comments on the Draft 2012 RTP/SCS, and on the future use of the SCS within Riverside County.

CVAG, WRCOG and our respective member jurisdictions worked with SCAG representatives to develop growth projections for the Coachella Valley and Western Riverside County subregions, and we appreciate SCAG's acceptance of our local input on these overall growth projections. These growth forecasts for population, housing, and employment in Riverside County underwent extensive review by both Agencies' members. Both the CVAG Executive Committee and the WRCOG Executive Committee adopted subregional growth forecasts at the jurisdictional (i.e. City and County) level. The Riverside County Board of Supervisors also approved growth forecasts for Riverside County at the jurisdictional level. Neither CVAG, WRCOG, nor the Board of Supervisors have endorsed or approved subregional growth projections at the TAZ level, nor were any more ambitious TAZ level plans made generally available to and generally accepted by the local planners in Riverside County.

We acknowledge SCAG's usage of TAZ-level data for scenario modeling purposes during the development of the Draft 2012 RTP/SCS. However, we did not anticipate the TAZ data that was recently released by SCAG; nor do we agree that they depict a realistic land use pattern that can or will be achieved in Riverside County by 2035. In most cases, the 2035 TAZ maps substantially deviate from our jurisdictions' adopted General Plans, and also deviate from other land use approvals.

We are also concerned that these maps were only recently made available to us for review. Due to the schedule of the Draft RTP/SCS public comment and review period, CVAG and WRCOG were not given substantial time to analyze this information and consult with our member jurisdictions regarding the potential implications of the growth projections depicted in the 2035 TAZ maps.

Accordingly, although CVAG and WRCOG support the use of the underlying projected population, household, and employment counts for policy purposes at jurisdictional levels, we do not support the

Hasan Ikhata  
February 14, 2012  
Page 2

use of the counts reflected in the recently-disclosed TAZ maps as a basis for CEQA streamlining or SCS consistency review under CEQA. Nor do we support the use of these maps for purposes of determining future infrastructure planned in Riverside County. Furthermore, we do not support the use of this information for the purpose of land use regulation or regulatory purposes of any kind. Finally, CVAG and WRCOG do not support SCAG's use of the TAZ maps and supporting data for determining future allocation of Compass Blueprint Program funds or any other funding incentives administered by SCAG or others.

We strongly urge that SCAG clarify that the use of TAZ-level data is for SCS modeling purposes only, and remove any language and policy statements from the Draft 2012 RTP/SCS that otherwise strengthen the standing of these unapproved data.

Thank you very much for your time and consideration of these issues. Please do not hesitate to contact Tom Kirk, CVAG Executive Director at (760) 346-1127 or by email at [tkirk@cvag.org](mailto:tkirk@cvag.org), or Rick Bishop, WRCOG Executive Director, at (951) 955-8303 or by email at [bishop@wrcog.cog.ca.us](mailto:bishop@wrcog.cog.ca.us) should you have any questions on this correspondence.

We look forward to hearing from you.

Sincerely,



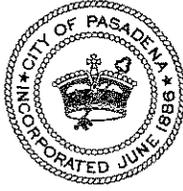
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Tom Kirk  
CVAG Executive Director



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Rick Bishop  
WRCOG Executive Director



OFFICE OF THE MAYOR

February 14, 2012

Jacob Lieb  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

Transmitted via Email to [lieb@scag.ca.gov](mailto:lieb@scag.ca.gov)

**Re: Comments on the Draft 2012 Regional Transportation Plan**

Dear Mr. Lieb:

Thank you for the opportunity for the City of Pasadena to provide comments on the Draft 2012 Regional Transportation Plan (RTP). The City of Pasadena's General Plan promotes the priority of non-auto trips and sets the tone for the Mobility Element with the Guiding Principle "Pasadena will be a city where people can circulate without cars." The Mobility Element relies upon an integrated and multi modal transportation system that provides choices for everyone living and working in the city. Implementing the projects and policies in the RTP will assist Pasadena in becoming a more livable city for the 21<sup>st</sup> Century.

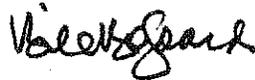
I believe you are aware of the active role Pasadena has played over a long period regarding any freeway connection that traverses our community. The issue of the 710 North extension, albeit being a tunnel alternative as opposed to a surface freeway, continues to be a sensitive topic among our elected officials, neighborhood groups and city residents. We request that the RTP recognize the on-going environmental study for this facility and not presuppose the ongoing studies by defining a route for the 710 north extension project.

The City of Pasadena supports the policies included in the RTP to encourage the expansion of local transit service to serve as feeder systems to the regional transit network. However the RTP does not address the limited funding resources that local agencies have in providing these important transit services. We would like the RTP to identify additional funding resources to expand local transit services and include polices that expand the availability of funding for local transit providers.

The City of Pasadena would like the regional transit connection between the North Hollywood Red Line/Orange Line Station and the Gold Line in Pasadena via Burbank and Glendale included in the RTP. This is an important transit project for our subregion and should be included in the RTP and should be considered for implementation using reasonably available funding sources described in the RTP Financial Plan.

Thank you for your consideration of this request.

Sincerely,

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

BILL BOGAARD  
Mayor

cc: Michael J. Beck, City Manager, Pasadena  
Frederick C. Dock, Director of Transportation, Pasadena



## Four Corners Coalition

LOS ANGELES, ORANGE, RIVERSIDE,  
AND SAN BERNARDINO COUNTIES

### RE: SCAG's draft Regional Transportation Plan 2012-2035

February 14, 2012

Dear Ms. Lin,

The Four Corners Coalition has a 20 year history of supporting regional solutions to the transportation challenges that occur in the heart of Southern California. The jurisdictional coordination where four of your six counties come together can be a challenge. We are very pleased with the cooperation that has occurred in the region over the past several years and the continuing efforts that are represented in the Regional Transportation Plan (RTP). For example: the Universal Transit Fare Cards (Smart Cards) are the exact type of regional alignment that is necessary for increasing the overall effectiveness of our transportation system.

- We would suggest that the various TSM strategies capture the essence of this by adding such phrases as:
  - **Multi jurisdictional** traffic signal synchronization, and
  - **Region wide** advanced traveler information,
  - **Multi agency** improved data collection,

We also support the principles outlined by the Global land use and Economics committee of SCAG:

- Provides Positive Economic Impacts – Pro Economic Growth and Job Creation
- Provides Local Control:
  - Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority
  - Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use and transportation
- Is CEQA Compliant and Defensible – The RTP/SCS is built to withstand a CEQA Challenge
- Is Balanced – The plan's call for New Revenue is balanced with Performance Measures, Reforms and Guarantees that assure the RTP is Effective, Efficient and Responsible
- Align the plan investments and policies with improving regional economic development and competitiveness. Avoid costly projects like a light rail desert connect that helps move money out of the southern California region to Nevada and does not address the immediate needs of the region's existing transportation needs.
- Maximize the productivity of our transportation system. Look at peak time pricing and transportation demand management (TDM) cost recovery approach.

- Encourage land use and growth patterns that facilitate transit and non motorized transportation. Efficient use of transit and transient oriented development will help balance the jobs/housing disparity among communities in the Four Corners Region.

**We continue to support the improvements to those freeways that carry significant intra-county traffic flow:**

- SR 71
  - SR 57 up to and including the SR 60 / SR 57 intersection
  - SR-91
  - I-15
  - I-10
- SR-71-Addition of one HOV lane in each direction from I-10 to SR-60
  - SR-91-Addition of one HOV lane in each direction from Adams to SR-60/21
  - I-10-Addition of one HOV lane in each direction from Haven to Ford
  - Addition of HOT lanes on I-10
  - SR-91-Conversion of HOV lanes to tolled express lanes and addition of direct connector
  - SR-91-Addition of one eastbound mixed-flow lane from SR-91/55 connector to SR-241 and one westbound mixed-flow lane from SR-241 to Imperial Highway
  - SR-91-Addition of one mixed-flow lane in each direction at various locations from SR-241 to Pierce Street
  - I-15 Construction of New Schleisman Rd IC and ramps with a NB/SB Auxiliary lane between Schleisman Rd IC and Limonite Rd IC.
  - SR-71- Pine Avenue connector from the SR-71 off-ramp to Pine/Schleisman Road for convertibility to the I-15, through Chino and Eastvale

If you have any questions regarding the comments, please feel free to contact me at any time.

Sincerely,



Gwenn Norton-Perry  
Chairperson  
Four Corners Coalition

February 14, 2012

Honorable Pam O'Connor, President  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

RE: Global Land Use and Economic (GLUE) Council Comments to the Southern California Association of Governments (SCAG) Regional Council on the Draft 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR).

Dear President O'Connor:

In April of 2009, the Global Land Use and Economic Council was formed to advise SCAG staff on the economic implications of SCAG's planning activities and to better engage key public and private stakeholders.

At its formation, the focus of the GLUE Council was centered on the implementation of SB 375 and how Southern California could reduce greenhouse gas (GhG) emissions and establish economic co-benefits through better planning for land use, transportation and housing throughout Southern California.

Nearly three years later, the GLUE Council's contributions have grown beyond SB 375 and the partnership has yielded some great success:

- In December 2009, partnering with the Southern California Leadership Council (SCLC) and SCAG, we successfully brought together key business leaders and public officials to voice Southern California's need for flexibility in SB 375 implementation.
- In September 2010, GLUE Council helped articulate to the California Air Resources Board the importance of linking GhG reduction targets for SB 375 to state commitments that will be critical to ensuring goals are met.
- In December 2010, the Southern California Road to Economic Recovery was a great success and the first public step in the development of Southern California's first Economic Growth Strategy.
- In May 2011, the Southern California Economic Recovery and Job Creation Strategy was unveiled and subsequently adopted with great support from GLUE Council.

As Southern California's top four industries are transportation dependent -- trade, technology, tourism and entertainment-- GLUE Council recognizes that investing in the region's transportation system is critical to its economic prosperity.

Over the last several months, GLUE Council has been actively engaged in the 2012-2035 RTP/SCS and applauds the tremendous effort SCAG has put into the process behind this Draft 2012 RTP/SCS & PEIR.

For almost three years, and including hundreds of meetings with its local government constituents and private sector stakeholders, SCAG has honored an inclusive approach to the development of this RTP/SCS.

**GLUE Council Thoughts and Recommendations:**

As a body representative of Southern California's broader business community, the GLUE Council recognizes the crucial roles that transportation and infrastructure play in maintaining this region's economy and quality of life. That is why throughout the RTP/SCS process the GLUE Council has focused on the plan's ability to deliver economic recovery, jobs recovery, and CEQA streamlining to the region.

The following key policies and principles are recommended by the GLUE Council for evaluating the plan as they represent the qualities of a good and sound RTP/SCS:

1. **Provides Positive Economic Impacts**
  - A plan that is pro economic growth and pro job creation – The RTP/SCS must undergo a true economic cost/benefit analysis so that economic impacts are understood and known by SCAG Regional Council members (and stakeholders) before making a final decision on the RTP/SCS.
2. **Provides Local Control**
  - Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority in order to assure local accountability.
  - Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use and transportation.
3. **Assures Revenue Sources are Fair, Understandable and Good for the Economy**
  - Transportation revenue concepts within the RTP/SCS must undergo cost/benefit and other appropriate analysis to assure that they are good for a recovering economy and future growth. They must also be fair and understandable, meaning that an appropriate nexus exists between who/what is being taxed and what is being paid for to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.
4. **Is Balanced and Accountable**
  - Revenues should be balanced with performance measures, reforms and guarantees that assure the RTP is effective, efficient and responsible to the citizens and taxpayers of Southern California.
5. **Is CEQA Compliant and Defensible**
  - The RTP/SCS is processed correctly from an environmental impact perspective, complies with appropriate legal requirements, and is able to withstand litigation challenges.
  - Provides for CEQA streamlining and protects against CEQA abuse

**Economic Analysis** – Throughout the RTP/SCS process, the GLUE Council has asked for and encouraged SCAG to focus on the plan’s benefits and impacts on the regional economy and job creation. The GLUE Council has argued that, done right, the RTP/SCS can be a major catalyst for the region’s economic and jobs recovery. Likewise, if not done right, the RTP/SCS could delay recovery or possibly even worsen the region’s struggling economy. With this in mind, early on the GLUE Council called for a complete economic analysis of the RTP/SCS, inclusive of a true cost benefit analysis.

GLUE Council appreciates SCAG’s dedicating resources to fully articulate the net economic benefits of the 2012-2035 RTP/SCS and supports the findings:

- Every \$1 spent on infrastructure investments yields a return of \$2.90
- The projected cost per day/per capita is less than \$2.00
- The projected benefit per day/per capita exceeds \$5.00
- The plan generates an average of 166,000 jobs per year from construction and maintenance expenditures
- Improved transportation benefits in commuting, accessibility and congestion relief yields 354,000 annual jobs

GLUE Council has reviewed the work of SCAG’s economic team and their analysis of the RTP/SCS and finds that it does show the plan to be one that “provides positive economic impacts”, which is one of GLUE Council’s key qualities of a good plan.

**Phase II of the Economic Recovery Strategy** – As part of the adoption of the RTP/SCS, the GLUE Council recommends that the SCAG also adopt Phase II of the Economic Recovery Strategy. The adoption could happen simultaneously with the adoption of the RTP/SCS or at the adoption of the RTP/SCS, SCAG could commit to a subsequent adoption of the Phase II Strategy (within six months).

The Phase II Economic Strategy would be a way for SCAG to take business community concerns with the RTP and turn them into a positive partnership. Working together, SCAG, GLUE and other stakeholders could develop the Phase II Strategy as a way to focus SCAG and local government on critically necessary regulatory reforms and strategies for new out of the box financing, especially in light of the dissolution of redevelopment agencies. The Phase II Strategy would also give SCAG and GLUE a vehicle for establishing a true Regional Economic Plan to go along with SCAG's other regional plans such as the RTP, the SCS and RHNA.

Upon adoption of the RTP/SCS and the Phase II Economic Recovery Strategy, GLUE Council looks forward to partnering with SCAG on actions to encourage increased business investment in Southern California, in order to retain the current business base, to identify opportunities for expediting project delivery, to reduce costs and to realize accelerated plan benefits.

Respectfully,



Greg McWilliams  
Chair, GLUE Council



# OLDA

February 7, 2012

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

## Re: **DRAFT Regional Transportation Plan and the OLDA Northern Corridor**

Mr. Ikhata:

On January 11, 2012, the Orangeline Development Authority (OLDA) Board of Directors voted to communicate to you its support for including the OLDA Northern Corridor in the Constrained Projects List for the 2012 Regional Transportation Plan. This addition provides connectivity necessary for the success of the OLDA Southern Corridor (West Santa Ana Branch), which is in the constrained list. The OLDA Northern Corridor coincides with much of the list of improvements being studied by Metro as the Antelope Valley Line Infrastructure Improvement Strategic Plan and the currently planned alignment of the California High Speed Rail project. The likelihood that funds would be available for these set of improvements are enhanced by the Memorandum of Understanding (MOU) being negotiated for use of Proposition 1A (High Speed Rail) funds.

The Orangeline Development Authority (OLDA) is a joint powers authority consisting of 14 members connecting the West Santa Ana Branch and Antelope Valley Line from the City of Cerritos to the City of Santa Clarita. It includes members in the Gateway Cities Council of Governments and San Fernando Valley Council of Governments.

OLDA is committed to the development of a high speed, grade separated, environmentally friendly and energy efficient transit **system**. Currently, OLDA Southern Corridor is in the constrained plan (West Santa Ana Branch).

**Recent events and planning efforts have focused attention on the OLDA Northern Corridor from Downtown Los Angeles to Santa Clarita.** Based upon these efforts, OLDA would like to suggest that the OLDA Northern Corridor be included in the constrained plan (Antelope Valley Line). Specific planning efforts in the corridor include:

OLDA is a joint powers agency formed to pursue development of a high speed environmentally friendly transit system in Southern California. The Authority is composed of the following public agencies:

City of Artesia

City of Bell

City of Bellflower

City of Cerritos

City of Cudahy

City of Downey

City of Glendale

City of Huntington Park

City of Maywood

City of Paramount

City of Santa Clarita

City of South Gate

City of Vernon

Burbank-Glendale-Pasadena  
Airport Authority

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City of Glendale  
Commissioner  
Burbank Glendale Pasadena  
Airport Authority

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Mayor  
City of Downey

### Secretary

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Mayor  
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### Treasurer

Michael McCormick  
Council Member  
City of Vernon

### Auditor

Scott A. Larsen  
Mayor  
City of Bellflower

### Executive Director

Michael R. Kodama

### General Counsel

Sandra J. Levin

### Ex-Officio

James McCarthy  
Caltrans, District 7



# OLDA

OLDA is a joint powers agency formed to pursue development of a high speed environmentally friendly transit system in Southern California. The Authority is composed of the following public agencies:

City of Artesia  
City of Bell  
City of Bellflower  
City of Cerritos  
City of Cudahy  
City of Downey  
City of Glendale  
City of Huntington Park  
City of Maywood  
City of Paramount  
City of Santa Clarita  
City of South Gate  
City of Vernon  
Burbank-Glendale-Pasadena  
Airport Authority

#### Chairman

Frank Quintero  
Council Member  
City of Glendale  
Commissioner  
Burbank Glendale Pasadena  
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#### Vice Chairman

Luis H. Marquez  
Mayor  
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Mayor  
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Council Member  
City of Vernon

#### Auditor

Scott A. Larsen  
Mayor  
City of Bellflower

#### Executive Director

Michael R. Kodama

#### General Counsel

Sandra J. Levin

#### Ex-Oficio

James McCarthy  
Caltrans, District 7

- **Bob Hope Airport** – The Burbank Glendale Pasadena Airport Authority and OLDA are conducting a \$5.4 million Ground Access Study. The grant provides planning and construction funds for improvements on the Antelope Valley Line and has become a catalyst for OLDA Northern Corridor improvements. The study focuses on multimodal transportation improvements linking to the regional system, including the feasibility of a new North Station on the Antelope Valley Line at Hollywood Way and San Fernando Road. The study has led to additional planning efforts that can lead to significant improvements linking Santa Clarita to Downtown Los Angeles. Further, the Airport is going to break ground on a Regional Intermodal Transportation Center (RITC). More details are in the SCAG RTP appendix entitled "Aviation and Airport Ground Access."
- **Antelope Valley Line Infrastructure Improvement Strategic Plan** - Metro is conducting a study to upgrade the Antelope Valley Line. The 75 mile corridor runs at-grade from Los Angeles Union Station to Lancaster and includes plans for several capital improvements. The Antelope Valley Line Study is providing the plan to create a shared corridor involving not only current Metrolink service but also part of the High Speed Train system. Results of this study should be available in March 2012 and are expected to include recommendations that meet many of the OLDA goals and objectives.
- **Memorandum of Understanding** - In January, 2012, a Memorandum of Understanding has been developed between the California High Speed Rail Authority, Southern California Association of Governments, Los Angeles County Metropolitan Transportation Authority, Southern California Regional Rail Authority and many other local transportation agencies. The MOU addresses advance investment of up to \$1 billion in Southern California as part of the CHSRA's commitment to a "Blended Approach" to the construction of the high speed train (HST) system in California. As you are aware, this MOU is a significant document that allows for this work to now be included in the Constrained portion of the Draft Regional Transportation Plan (RTP). This can lead to the planning and funding necessary to include OLDA's Northern Corridor in the Constrained portion of the RTP.



# OLDA

OLDA is a joint powers agency formed to pursue development of a high speed environmentally friendly transit system in Southern California. The Authority is composed of the following public agencies:

City of Artesia  
City of Bell  
City of Bellflower  
City of Cerritos  
City of Cudahy  
City of Downey  
City of Glendale  
City of Huntington Park  
City of Maywood  
City of Paramount  
City of Santa Clarita  
City of South Gate  
City of Vernon  
Burbank-Glendale-Pasadena  
Airport Authority

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Frank Quintero  
Council Member  
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Luis H. Marquez  
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City of Downey

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Mayor  
City of Bellflower

Executive Director

Michael R. Kodama

General Counsel

Sandra J. Levin

Ex-Oficio

James McCarthy  
Caltrans, District 7

Again, on behalf of the OLDA Board, we would like you to work with us on how we can include the OLDA Northern Corridor in the Constrained Project list for the 2012 Regional Transportation Plan.

If you have any questions or need further information, please contact Michael Kodama, OLDA Executive Director at 562 663-6850.

Sincerely yours,

Frank J. Quintero  
Chairman

Riverside County Transportation Commission

February 14, 2012

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

Subject: Comments on the Draft 2012 Regional Transportation Plan

Dear Mr. Ikhata:



Thank you for the opportunity to comment on the Draft 2012 Regional Transportation Plan (RTP) for the Southern California Association of Governments (SCAG) region. This long range transportation plan reflects multimodal transportation projects and programs throughout the vast six county SCAG region including land use, demographic, environmental, and health considerations. The Riverside County Transportation Commission (RCTC) appreciates SCAG's effort in developing this comprehensive document using a bottom-up approach and broadening the public participation opportunities that were made available in developing the Draft 2012 RTP. RCTC also thanks SCAG for supporting county sales tax measure programs and projects in the RTP as this demonstrates a commitment to the voters that our measure programs will be implemented in accordance with the respective county measure ordinances.

RCTC is submitting its formal comments on the RTP and will submit minor comments/clarifications, including changes to the project lists, to reflect the most accurate information via the SCAG website as RCTC was informed the website has been set up specifically to accommodate project list corrections.

RCTC's formal comments are as follows:

**Chapter 2, Transportation Investments****Page 41, Congestion Management System**

The 2012 RTP Sustainable Communities Strategy (SCS) addresses federal requirements for the Congestion Management System (CMS). Specifically, the RTP SCS component contains Transportation Demand Management strategies, which is a required element for County Congestion Management Programs (CMP) to meet federal CMS guidance. The individual county CMPs, Caltrans CSMPs, and the SCS give the entire picture of the region's TDM efforts. Therefore, RCTC requests the following be removed:

“First, SCAG will incorporate a requirement in the FTIP guidelines that calls for submittal of documentation by the sponsoring agencies associated with significant roadway capacity projects (greater than \$50 million) to ensure documentation of all the alternatives considered in defining the project as well as identifying appropriate mitigation that would be implemented in conjunction with the project.”

This requirement should also be removed from the FTIP guidelines since a comprehensive view of the regions’ TDM projects and programs is clearly highlighted in county CMPs, Caltrans CSMPs, and the RTP SCS.

**Page 43, Completing Our System**

Table 2.2 Major Highway Completion Projects includes one to two projects per county emphasizing “critical gaps in the network that hinder access to certain parts of the region.” The project identified in Riverside County is “CETAP Intercounty Corridor A.” RCTC requests that this project be removed from the list and be replaced with the SR-79 realignment (RTP ID# RIV62024), and the I-215 widening project from Scott to Nuevo (RTP ID# RIV070309).

**Page 44, Completing Our System**

Table 2.3 identifies Major HOV Projects for each county. The I-215 Bi-county project is listed under San Bernardino County from Spruce Street to Orange Show Road. This project is also in Riverside County. RCTC requests that SCAG clarify that the project is in San Bernardino, from Orange Show Road to the Riverside-San Bernardino County line, and in Riverside County from the Riverside-San Bernardino County line to Spruce Street.

Table 2.3 does not include the SR-91 HOV lane project (RTP ID# 010212). RCTC requests that SCAG add this project to the table as it is a major highway project that will begin construction this year and, together with the I-215 Bi-county project, will provide a continuous HOV system from Orange County to San Bernardino County along the SR-91/I-215 corridor.

**Page 46, Strategically Expanding Our System**

Exhibit 2.1 Major Highway Project - This map highlights highway improvement projects to be implemented by 2035. RCTC requests that the Mid County Parkway (RTP ID# RIV031218) and SR-79 realignment (RTP ID# 62024) be added to the map.

### **Page 76 – 79, Environmental Mitigation**

This section discusses Conservation Planning, Biological Resources and Open Space, Locations for Mitigation, etc. RCTC requests that SCAG include Riverside County's Multiple Species Habitat Conservation Plan (MSHCP) efforts in Western County and Coachella Valley in this section as an example of what counties are doing to mitigate environmental impacts. Information on the Western County MSHCP is available at <http://www.wrc-rca.org>. Information on the Coachella Valley MSHCP is available at <http://www.cvmshcp.org>.

### **Pages 78 - 84, Summary of the Environmental Mitigation Program**

This section describes various mitigation programs for: Biological Resources and Open Space, Green House Gas, Air Quality, Transportation and Safety, Population and Housing, Land Use, Aesthetics, Public Services and Utilities, Geology, Soils, and Seismicity, Cultural Resources, Water Resources, Hazardous Materials, and Noise. Under each of these programs is a list of measures using action words such as "coordinating", "minimizing", "identifying", "work with", "encourage", etc. But some of the programs have measures that say "require the project implementation agencies to...." Examples of "require" statements for the public services and utilities program are below:

- Require the project implementation agencies to identify police protection, fire service, emergency medical service, waste collection, and public school needs and coordinate with local officials to ensure that the existing public services would be able to handle the increase in demand for their services; and
- Require the project implementation agencies to identify the locations of existing utility lines, and avoid all known utility lines during construction.

RCTC suggests that SCAG replace the word "require" in each mitigation section with either "encourage" or "support" as SCAG does not have the authority to "require" mitigation measures by agencies outside of its purview. Additionally, this section and the PEIR include mitigation measures that restate existing requirements enforced by other agencies. Therefore, RCTC suggests that such measures do not need to be repeated in this list of mitigation measures. Moreover, mitigation measures in the RTP should be programmatic in nature and not specific to individual projects. Individual project efforts at the local level are already required to comply with all state and federal environmental laws; providing specific mitigation actions in the RTP are redundant and could result in conflicts with project specific environmental approvals for voter approved and other transportation projects.

**Chapter 4, Sustainable Communities Strategy**

**Page 128, Resource Areas and Farmland**

This section talks about areas to be protected from development including parklands, open space, natural resource areas, and farmland. It says that “SCAG is also developing a natural lands acquisition and open space conservation strategy to encourage large-scale acquisition and management of critical habitat to mitigate impacts...” RCTC also requests that SCAG mention Riverside County’s MSHCP accomplishments in this section.

**Page 151, Table 4.4 Transportation Network Actions and Strategies**

Another action/strategy listed is “Cooperate with stakeholders, particularly county transportation commissions and Caltrans, to prioritize funding sources for preservation and maintenance of the existing transportation network.” RCTC agrees that there is insufficient funding for System Preservation. Each county transportation commission established projects and programs with various ways to fund and implement them. Funding is limited and it would be more beneficial to work with stakeholders in identifying a new funding source or increased funding levels instead of competing with very limited existing fund sources. RCTC suggests that SCAG revise the wording to “...to **identify new funding sources and/or increased funding levels** for preservation and maintenance..... “ This recommended change should also be reflected in Chapter 2, Page 39, under System Preservation.

RCTC thanks SCAG staff for their efforts in developing the 2012 Draft RTP for one of the largest areas with the highest population and diverse demographics in the state and nation. The challenges this region faces are plentiful; however, working cooperatively with our transportation partners will allow us to fully meet those challenges.

Sincerely,



Anne Mayer  
Executive Director

cc: RCTC Commissioners



# SAN FERNANDO VALLEY COUNCIL OF GOVERNMENTS

A JOINT POWERS AUTHORITY

5121 VAN NUYS BOULEVARD 2ND FLOOR • SHERMAN OAKS CA 91403  
818-712-9500 FAX 818-712-9182 • EMAIL: INFO@SFVCOG.ORG

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CITY OF GLENDALE  
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4TH DISTRICT, CITY OF LOS ANGELES

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TREASURER, COUNTY OF LOS ANGELES

LEGAL COUNSEL  
THOMAS J. FAUGHNAN  
PRINCIPAL DEPUTY COUNTY COUNSEL,  
COUNTY OF LOS ANGELES

LEGAL Co-COUNSEL  
ARLETTA MARIA BRIMSEY, DEPUTY CITY  
ATTORNEY, CITY OF LOS ANGELES

February 14, 2012

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 W. Seventh St. 12th Floor  
Los Angeles, CA 90017-3435

## Re: Comments on the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy

Dear Director Ikhata:

SCAG is to be congratulated on the production of this unprecedented draft document that does laudable job of combining a Regional Transportation Plan and the inaugural "Sustainable Communities Strategy."

The San Fernando Valley Council of Governments represents the San Fernando and Santa Clarita valleys, a metropolitan region of over two million—more populous than 15 states, and one of the largest unified regions in the United States. Until now, we have not always had the opportunity to fully participate in SCAG planning activities as a region. We welcome this opportunity.

Because of the shortness of time, we will be unable to submit a full and substantive reply by the end of the public comment period on February 14, 2012. We note that SCAG's regional transportation modeling area covers the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. This modeling area is divided into 11,267 Transportation Analysis Zones (TAZs). Unfortunately, the TAZ maps were only made available on January 26th of this year. There has been very little time for meaningful analysis.

The City of Los Angeles and other respondents have noted that the plans tend to be inconsistent with existing Community Plans and General Plans. This could result in confusion, cost and needless litigation. We would like to reserve the opportunity to comment further as the process continues to unfold.

Substantive points have been raised by several credible groups. Given the significance of the RTP/SCS, we must approach this task with care, and the issues raised by SCLC, OCBC and the City of Los Angeles, inter alia, certainly bear further, and more detailed discussion.

Further consideration is needed on "Policies and Principles of a Sound RTP/SCS" as stated:

1. Provides Positive Economic Impacts ... A Plan that is pro economic growth and job creation

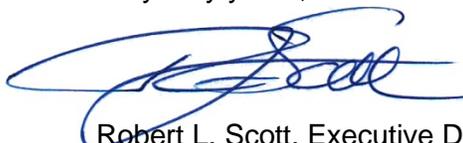
2. Provides Local Control ... A Plan that honors local control and flexibility over land use and transportation
3. Assures New Revenue Sources are Fair, Equitable and Economically Sound
4. Is Balanced and Accountable
5. Is CEQA Compliant and Defensible
6. Provides for CEQA Streamlining and Protects Against CEQA Abuse

As a matter of process, it is recommended as follows:

- Extend the public comment period to allow a more full and fair discussion of the issues.
- Create an Issue Matrix of all recommendations to allow easier reference, for discussion and resolution.
- Share the Issue Matrix, including pros and cons with all subregions, COGs, stakeholders and the Regional Council.
- Highlight controversial issues for detailed discussion and consensus building.
- Seek strategies that emphasize empowerment and incentives rather than compliance and regulation.
- Set forth overarching disclaimers [local jurisdictions' reservation of rights] to clarify what the RTP/SCS is not. Focus on the legal implications of the RTP/SCS and PEIR.
- Reconcile reduction in greenhouse gases (GHG) with loss of gas tax revenues.
- Provide outreach and public information that contains standardized references, metrics and common denominators—materials that can be readily understood by local leaders, constituents and the consuming public.
- Emphasize the economic realities of existing transportation systems, and explain the need for, and alternatives for future improvements.

Thank you for the opportunity to provide input on this important process.

Very truly yours,



Robert L. Scott, Executive Director  
San Fernando Valley Council of Governments



# City of Hemet

PLANNING

445 EAST FLORIDA AVENUE · HEMET, CALIFORNIA 92543

(951) 765-2375

February 14, 2012

Mr. Hasan Ikhata  
Executive Director  
SCAG

[RTP@scag.ca.gov](mailto:RTP@scag.ca.gov)

818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**SUBJECT: City of Hemet Response to Draft 2012-2035 RTP/SCS**

Dear Mr. Ikhata:

The City of Hemet appreciates the opportunity to respond to the Draft RTP/SCS. Overall, we commend you on the comprehensiveness of the document and recognize the complexity of the task to update the RTP in concert with the region's first Sustainable Communities Strategy in compliance with SB 375. We also appreciate the time and effort that SCAG has taken to outreach and obtain input from the local agencies in the preparation of the RTP/SCS, and specifically in meeting with the City of Hemet staff regarding revisions to the growth and housing projections. The City of Hemet sincerely thanks you for accommodating our previous comments in the preparation of the Growth Forecast and draft RHNA numbers.

The City of Hemet has had an opportunity to review the Draft RTP/SCS document, and offers the following comments for your consideration.

## **Draft Regional Transportation Plan:**

1. The two highway projects of major interest to the City of Hemet are the realignment and widening of SR 79 from Domenigoni Pkwy to Gilman Springs Road (FTIP ID RIV62024) and the completion of the Mid-County Parkway (FTIP ID RIV031218). The City's long-term growth projections, employment base, housing conditions, and overall economic health depend in large part upon the completion of these two thoroughfares. Specifically, our comments on the RTP regarding highways are noted below:
  - a. Exhibit 2.1 Major Highway Improvements (2035) does not show the realigned SR 79 through the Hemet area and connecting to major east-west corridors to the north, or the Mid-County Pkwy. The City requests that these critical roadway improvements be included on Exhibit 2.1.
  - b. Table 2.2 shows a list of Major Highway Projects in the region. For Riverside County, the CETAP Intercounty Corridor A is noted, however our understanding is the planning for that corridor is delayed. We suggest that Table 2.2 be updated to reflect more essential projects that are a higher priority for Riverside County, such as the Mid-County Pkwy and the SR 79 Realignment project noted above.

- c. In the Highways & Arterials Report, Exhibit 4 and Exhibit 9 should be corrected to include the SR 79 and Mid-County Pkwy road projects, as noted above. In addition, Exhibits 11 and A16 also do not appear to include these critical roadways, although the scale of the map makes it difficult to determine if these roadways are included, or if the map reflects improvements to existing local arterials in the area. Please verify the highway improvements included on these Exhibits and update the exhibits as needed to address these roadways.
  - d. In the Financially-Constrained RTP list of projects, Warren Road from Domenigoni Pkwy to Esplanade Ave (ID Riv 3A01WT041), should be shown as widening from 2 lanes to 6 lanes, consistent with the City of Hemet's updated General Plan Circulation Element.
2. The City strongly supports the extension of a commuter rail line to Hemet. It will reduce vehicle miles traveled considerably and help spur residential and economic growth in the valley. However, the proposed Perris Valley Line (RTP ID 3CR0702) does not indicate a station in Downtown Hemet. Our recently adopted General Plan 2030 includes a high-density transit-oriented development strategy based upon the siting of a Metrolink station in the downtown area. In addition, SCAG previously prepared a Compass Blueprint Project for a Transit Village surrounding a future Metrolink station in Downtown Hemet. We request consideration of adding a station to this project in Downtown Hemet.
  3. In addition, as noted in the RTP (ID 3CR0702), a station is proposed at the Hemet-Ryan Airport. The locations immediately around the airport are constrained by existing development and environmental factors. The City requests that the "Hemet Airport; Sanderson Ave @ Stetson Rd" location be replaced with "West Hemet @ Stetson Rd". This location is consistent with the recently adopted update to the City of Hemet's General Plan that anticipates transit-oriented development and mixed-use residential, commercial, and business park uses in the West Hemet area, adjacent to the Perris Valley Line.
  4. The City would like to co-locate a bus transit center with the Hemet Downtown Metrolink station. FTIP ID RIV041030 on page 75 of the FTIP Project List indicates the location of the transit center at 700 Scaramella Circle. This is the site of the RTA bus yard and not appropriate for passenger use. Please reference "in the vicinity of State Street and Devonshire Avenue" as the location for the new Hemet Transit Center in the FTIP. The City is currently working with RTA on locating a transit center at this location in Hemet's Downtown area which would be adjacent to a future Metrolink Station, as well as a proposed Courthouse facility and mixed-use Transit Village.

**Draft Sustainable Communities Strategy:**

5. The City is committed to the SCS tenets and concepts. We recently updated our General Plan and incorporated many sustainability and mixed-use development measures in accordance with these principles. However, it appears that the only way to determine ongoing consistency with the SCS is to use the Local Sustainability Planning Tool (LSPT), which is not practical for us. Our jurisdiction does not have the resources to access or use the tool, although we did submit our comments and revisions to the map during the local input process. We are not able to completely ascertain whether our comments have been integrated into the SCS land use model and mapping, based upon the regional scale of the maps provided to date in the SCS.

6. We are also unclear as to whether consistency with the SCS is determined on the basis of the revised city-wide Growth Forecast numbers submitted and approved by Hemet and the WRCOG's member jurisdictions, or a land use distribution pattern that has been aggregated and shown in the SCS in very broad terms? We have only recently become aware of growth maps based on TAZ data that has not been confirmed by the City of Hemet or other WRCOG jurisdictions, and have concerns regarding the land use accuracy and future application of these maps in determining consistency with the SCS or our adopted General Plan. The City of Hemet concurs with and supports the comments submitted by WRCOG in their comment letter dated February 13, 2012 regarding the use of TAZ data and mapping for anything other than scenario modeling purposes. Please provide a clarification as to the use of the TAZ data and additional review time to analyze the recently released maps at a scale that we can determine consistency with our existing and future land use patterns.
7. Thank you for recognizing that Hemet and other cities on the region's periphery have less housing capacity than the original forecast assumptions. We sincerely appreciate SCAG's effort to revise the Growth Forecast numbers and continue to support the Revised Growth Forecast for the City of Hemet, as adopted by WRCOG, and the 2035 build-out projections.
8. Per the comments noted above for the locations of Metrolink and Transit Stations in the City of Hemet, Exhibit 4.9 of the SCS needs to be updated to reflect the appropriate transit locations. In addition, it appears that the HQTAs nodes shown do not align with the actual rail line locations. Again, it is difficult to determine at the scale of the map provided in the SCS.

The City of Hemet is committed to the RTP/SCS plan and process and sincerely appreciates the outreach SCAG has provided to local government to participate in this important regional plan. The City has been impressed with the level of cooperation and consideration that SCAG has made to the concerns raised by the City of Hemet and the Western Riverside County region in the development of the many components of the plan. We recognize that well-designed and well-functioning transportation systems aligned with sustainable land use policies are imperative to our future growth and development. We respectfully request that you consider the comments noted above as you prepare the final RTP/SCS for adoption, and request that we be informed as to future hearing dates regarding the Plan.

Sincerely,



Deanna Elliano  
Community Development Director

CC: Hemet City Council  
Margaret Lin, SCAG  
Rick Bishop, WRCOG  
Shirley Medina, RCTC  
Gordon Robinson, RTA  
Lorelle Moe-Luna, RTA  
Brian Nakamura, Hemet City Manager  
Jorge Biagioni, Hemet Engineering Director



February 14, 2012

Attn: President Pamela O'Connor  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

**Re: 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy**

Dear President O'Connor and Southern California Association of Governments Regional Council Members. Thank you for seeking public input on the draft Regional Transportation Plan and Sustainable Communities Strategy. The Urban and Environmental Policy Institute at Occidental College supports transportation and land use policies and spending to make the region more just, green, and livable. We are pleased that the draft RTP and SCS have a number of positive elements expanding clean transportation, encouraging more sustainable land uses, and reducing greenhouse gas emissions:

- The planning process took account of the relationship between transportation, land use, sustainability, environmental justice and economic development.
- The draft plan calls for significant investments in transit construction, operations and maintenance.
- The draft plan increases investments in active transportation compared to previous RTPs.
- The draft plan anticipates that vehicle miles traveled will increase less than population growth.
- The sustainable communities strategy quantifies how different forms of growth will have very different impacts on sprawl, energy and water use and other sustainability indicators.
- The draft plan anticipates adoption of zero emission technologies towards the end of the plan time frame.
- The draft plan supports high speed rail.
- The draft plan anticipates a reduction in greenhouse gas emissions from transportation in line with the goals of SB 375.
- The single largest anticipated funding source in the draft plan is implementation of a fee on driving or an increase in the gas tax, either of which would discourage driving.
- Much of the new highway space proposed in the draft plan is toll roads, HOV lanes, or HOT lanes (open to HOV or Tolls) and therefore may lead to less new, induced driving than the provision of free, multiuse lanes.

We however believe that the plans can do more and need to do more to expand alternatives to driving; price car and truck traffic to reflect their negative externalities; reduce the amount of space given to cars, trucks and parking; create good places rather than sprawl; and clean up the goods movement industry.

## Recommendations

**A. Rapidly create a more balanced transportation system.** The SCAG region has 21,638 center-line miles of road (55,890 lane miles of roads), 4315 miles of bikeways of varied quality (almost zero of it protected lanes on streets), and 470 miles of passenger trains (only 80 miles of which is light rail/subway, the rest metrolink). Opportunities and infrastructure to walk, bike, and take transit should be rapidly expanded so residents have choices for how to get around.

1. Significantly increase investments in active transportation from the \$6 billion budgeted. The Los Angeles County Department of Public Health calculates that \$40 billion is needed to fix sidewalks, implement jurisdictions' bike plans; and invest in last mile infrastructure near transit stations.

[http://saferoutescalifornia.files.wordpress.com/2011/11/dph-cost-methodology-presentation\\_dec14\\_2-11\\_notes.pdf](http://saferoutescalifornia.files.wordpress.com/2011/11/dph-cost-methodology-presentation_dec14_2-11_notes.pdf)

- Streets are our most important public spaces so we should reconfigure them to be vibrant, safe, healthy places rather than spaces designed to move as many cars as possible without regards for impacts on adjacent activities. Active transportation funding should convert existing arterials and local streets to be world class living and complete streets. SCAG should encourage jurisdictions to follow the street design standards contained in the Model Design Manual for Living Streets
- Most cities in the SCAG area have not developed bike or pedestrian plans so part of this funding should go towards assisting these cities in developing plans early in the implementation years.
- Most people will not ride bicycles in traffic (or separated from traffic by a painted line). In the developed world, every nation with high rates of cycling has separated bike facilities while every nation with low cycling rates lacks this infrastructure.

<http://www.ta.org.br/site/Banco/7manuais/VTPIpuchertq.pdf> Let's start creating a network of protected bike lanes/ cycletracks in all urbanized areas of Southern California, like the Dutch did beginning in the mid 1970s.

<http://www.youtube.com/watch?v=XuBdf9jYj7o> Budget at least \$1 billion for the construction of 1000-2000 miles of protected bike lines to increase rates of cycling among non traditional cyclists (protected lanes recently constructed in Long Beach

<http://www.bikelongbeach.org/News/Read.aspx?ArticleId=85> cost approximately \$580,000 per mile).

2. Expand and accelerate transit investments so all planned transit projects in the RTP are constructed by 2022. Existing and new transit services should be funded so as to be affordable with frequent service. Rapid buses should serve all major streets in urban areas so that buses become the default motorized transportation choice. <http://www.humantransit.org/2010/11/los-angeles-some-thoughts-on-the-challenge-for-the-source.html>

**B. Pay for additional active transportation and transit investments by defunding harmful highway projects and by identifying local revenue sources that tax harmful transportation.** Moving people by cars and materials by trucks and diesel trains and separating where we live from where we work and shop produces fatal collisions, <http://map.itoworld.com/road-casualties-usa> cancer and heart disease, <http://hydra.usc.edu/scehsc/web/Resources/Key%20Research%20Studies/Resources-%20Key%20Research%20Studies.html> obesity and diabetes <http://designinghealthycommunities.org/> and climate change <http://www.pnas.org/content/early/2010/02/02/0906548107.full.pdf?with-ds=yes> , with a disparate impact on residents of low income neighborhoods bisected by highways and living near ports, warehouses, railyards and intermodal facilities. SCAG should projects that increase harmful transportation and tax driving and freight transport to pay for clean transportation.

1. Cancel highway expansion projects to pay for more active transportation and transit. Among the dozen most expensive road expansion projects in the RTP are: east west freight corridor (\$15.2 billion), Riverside to Orange County CETAP (\$13 billion), high desert corridor (\$6.9 billion), 710 corridor expansion (\$6.1 billion), 710 gap closure (\$5.6 billion), 5 north capacity enhancements (\$5.3 billion), 241 expansion (\$2.7 billion), mid county parkway (\$2.3 billion), 15 widening (\$ 1.7 billion), 405 widening in Orange County (\$1.7 billion), 5 widening (\$1.6 billion), and 79 expansion (\$1.4 billion). Building these highways projects will expand driving (and, if built in areas with predominately rural or suburban land uses, also expand sprawl). Cancelling them can allow the \$63.5 billion budgeted for these projects to be spent on active transportation and transit.
2. Support local revenue sources that price driving, parking, and freight transport to reflect the externalities of motorized transportation. There are a variety of methods for increasing the price of driving, some of which are contemplated in the RTP's financial plan. [http://rtpscs.scag.ca.gov/Documents/2012/draft/2012dRTP\\_03\\_Financial.pdf](http://rtpscs.scag.ca.gov/Documents/2012/draft/2012dRTP_03_Financial.pdf) higher gas taxes, carbon taxes, charges based on miles driven, appropriately and dynamically priced parking <http://sfpark.org/> , and congestion charges aimed at commuters entering central city areas <http://www.tfl.gov.uk/roadusers/congestioncharging/> are all useful policies.

**C. Reduce rather than increase the space granted to cars and trucks in order to reduce driving.** Roads and parking currently take up too much of our land, which encourages car-based transportation and all the problems that accompany it. Driving increases when roads are constructed, lengthened or widened.

1. Do not add any lane miles of highways or major arterials. The SCAG region currently (base year 2008) has 21,638 miles of road and 55,890 lane miles of roads. The draft RTP anticipates adding 948 centerline miles/ 7419 lanes miles which would be a 4.4%/ 11.1% increase. As Duranton and Turner have shown, "For interstate highways in the densest parts of metropolitan areas we

find that vkt increases in exact proportion to highways, confirming the ‘fundamental law of highway congestion’ suggested by Downs (1962, 1992). This relationship also approximately holds for other important roads in dense areas and for interstate highways in less dense parts of metropolitan areas.” <http://ideas.repec.org/p/tor/tecipa/tecipa-370.html> Converting mixed flow lanes to toll, HOV or HOT lanes or converting HOV lanes to toll or HOT lanes would still be acceptable.

2. Set a target to reduce vehicle miles travelled from the baseline year of 2008. Vehicle Miles travelled in the baseline year 2008 was 445,844 daily, approximately half on freeways, half on arterial roads. SCAG calculates that this number will rise to 546,806 daily by 2035 without any changes to roads (a 22.6 % increase). Under their plan, VMT will still rise, to 516,990 (16% increase). They also anticipate that VMT for trucks will grow even faster, expanding from 30,201 to 53,431 under their 2035 plan (a 76.9% increase). [http://rtpscs.scag.ca.gov/Documents/2012/draft/SR/2012dRTP\\_Highways\\_and\\_Arterials.pdf](http://rtpscs.scag.ca.gov/Documents/2012/draft/SR/2012dRTP_Highways_and_Arterials.pdf) Instead of planning for this increase, set a target for a reduction in VMT.
3. Plan for highway removal or modification. Learning from cities removing highways <http://www.cnu.org/highways/freewayswithoutfutures2012> , agencies and municipalities should plan to remove, cover or alter and reclassify as arterials highways that divide communities, negatively impact valuable natural resources such as rivers and coasts, or channel excessive traffic into neighborhoods. Freeway stubs such as the 710 N above the 10 or the 2 as it approaches Silverlake are ripe for removal or conversion and the 101 through downtown Los Angeles has been the subject of advocacy for capping for a park. <http://www.park101.org/>

**D. Pursue stronger sustainable communities strategies to create good places rather than sprawl.** People are drawn to diversity [http://www.amazon.com/Life-Between-Buildings-Using-Public/dp/1597268275/ref=sr\\_1\\_1?ie=UTF8&qid=1328728803&sr=8-1](http://www.amazon.com/Life-Between-Buildings-Using-Public/dp/1597268275/ref=sr_1_1?ie=UTF8&qid=1328728803&sr=8-1) in the built environment [http://www.amazon.com/American-Cities-Anniversary-Modern-Library/dp/0679644334/ref=sr\\_1\\_2?s=books&ie=UTF8&qid=1328728897&sr=1-2](http://www.amazon.com/American-Cities-Anniversary-Modern-Library/dp/0679644334/ref=sr_1_2?s=books&ie=UTF8&qid=1328728897&sr=1-2) , so municipalities should increase interesting, mixed-use neighborhoods by focusing growth near transit and altering zoning rules that restrict mixed use development to a small fraction of cities’ land area.

1. Adopt alternative 3 (the envision 2 alternative) smart growth land use and housing patterns) rather than the planned project. [http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR\\_4\\_0\\_Alternatives.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/draft/2012dPEIR_4_0_Alternatives.pdf) This alternative version of the plan relies on smart growth land use and housing patterns to achieve superior environmental results in air quality, aesthetics, open space and farmland preservation, water conservation, greenhouse gas emissions reductions, mobility, and land use.
2. Fund local jurisdictions to allow them to update their general plans and zoning codes to reflect sustainable community and smart growth principles.

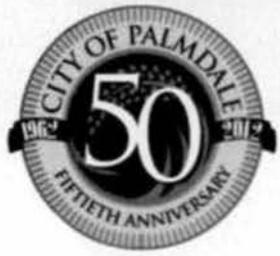
3. Encourage sensitive densification of existing single family zoned areas by encouraging municipalities to allow cottage housing, duplexes, accessory dwellings, and small lot subdivisions in R-1 zones.
4. Encourage all jurisdictions to eliminate mandatory parking minimums for existing and new buildings.  
<http://shoup.boi.ucla.edu/ProblemsWithParkingRequirementsInZoningOrdinances.pdf>

**E. Clean up goods movement industry before planning to expand it.** Do not invest in goods movement roads and rail expansion in the hopes that zero emission technologies will emerge decades later. Invest more in zero emissions trucks and locomotives now as a precondition before expanding freight infrastructure. Otherwise impacted communities will continue to suffer disproportionately from pollution from good movement. <http://departments.oxy.edu/uepi/publications/GlobalTrade.pdf>

1. Require widespread adoption of zero emissions trucks and rail in the region as a precondition for funding any expansion of goods movement infrastructure.
2. Recommend a \$30 per twenty-foot container fee for moving either into or out of the ports to help pay for mitigation of existing environmental impacts and to help pay for research into zero emission alternatives. This strategy could generate as much as \$441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports.
3. Require maximum development of on dock rail before funding any off dock projects.

We look forward to working with you to improve the plan and create a more just, green and livable region.

Mark Vallianatos  
Policy Director  
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323 259 1458



# PALMDALE

*a place to call home*

February 14, 2012

JAMES C. LEDFORD, JR.  
*Mayor*

STEVEN D. HOFBAUER  
*Mayor Pro Tem*

LAURA BETTENCOURT  
*Councilmember*

MIKE DISPENZA  
*Councilmember*

TOM LACKEY  
*Councilmember*

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

RE: Comments of the Draft 2012 RTP/SCS and Related Program EIR

Dear Mr. Ikhata:

The City of Palmdale would like to thank the Southern California Association of Governments (SCAG) and its staff for preparation of the draft 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and related Program Environmental Impact Report (PEIR). Further, we appreciate the opportunity to review and comment on these draft documents and offer the following comments as discussed below.

1. The City worked diligently with SCAG to develop the growth projections for population, housing and employment data for the 2008 (existing), 2020, and 2035 years. These growth projections represent what we feel is a realistic growth rate projection based upon the information available to us as well as our understanding of City and Antelope Valley growth related issues. Further, these numbers also reflect our draft RHNA allocations. Therefore, it is our position that the adoption of the growth forecast numbers continue to be done at the local level and not at a larger sub-regional or county level.
2. The RTP does not mention the Palmdale Energy Action Plan (PEAP) and we feel that there should be some type of reference and/or acknowledgement of the City's efforts to address GHG reduction. This issue was mentioned at several sub-regional coordinator meetings in which SCAG indicated that they would include this in the document but did not.

*Auxiliary aids provided for*

*communication accessibility*

*upon 72 hours' notice and request.*

3. The City is concerned about the methods to be used by SCAG on implementing and monitoring proposed mitigation measures for the RTP/SCS as they apply to local agencies. The document should specify to what extent mitigation measures are to be complied with at the local level. On a project level, certain specific mitigation measures may not be applicable at all to a project or may only be applicable when the mitigation measure is achievable or reasonable. Further, it should be stipulated what the consequences are, if any, for the local governments non-compliance with the mitigation measures.
4. The RTP/SCS identifies strategies to reduce greenhouse gas emissions from cars and light duty trucks. The City has concerns related to the implementation of these proposed strategies. These strategies should not be required individually but with several discretionary options made available to the City to satisfy GHG emission reduction goals.
5. The SED disaggregation at the TIER II TAZ level does not correlate with the City's land use plan. Provide clarification on methodology used. How will our city be able to make the necessary consistency findings for projects that are eligible for CEQA streamlining benefits if the modeling results do not match our locally adopted General plan? This shall be clarified.
6. Page 156 of the Aviation and Airport Ground Access supplemental document should be updated to reflect the reflect the California High Speed Rail Authority's January 12, 2012, decision to discontinue the study of the Grapevine alignment and to continue the final study of an Antelope Valley alignment and station in the City of Palmdale.

Ltr. to Hasan Ikhata  
Comments on draft RTP/SCS  
February 14, 2012  
Page 3

We appreciate your review and consideration of the comments provided by the City and look forward to your responses on these items. The larger agencies and councils within the SCAG region will likely have a substantial amount of comments on the draft RTP/SCS plan and EIR. We have attempted to limit our comments to those issues having the greatest potential impact to the City of Palmdale.

Please feel free to contact me at (661) 267-5293 should you have any further questions.

Sincerely,



Richard Kite  
Planning Manager

cc: Mike Behen

# Southern California Contractors Association, Inc.

6055 E. Washington Blvd., Suite 200  
(323) 726-3511  
Website: [www.sccaweb.org](http://www.sccaweb.org)



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February 13, 2012

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Hasan Ikhata

Executive Director

Southern California Association of Governments

SCAG Main Office, 818 W. 7th Street, 12th Floor

Los Angeles, CA 90017

## RE: Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)

Mr. Ikhata:

On behalf of the Southern California Contractors Association's (SCCA), more than 300 union contractors, crane operators and industry suppliers engaged in heavy civil construction in southern California, I write you today provide comments on the Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). SCCA has served the union heavy construction industry since 1974, including contractors' signatory with the Operating Engineers, Laborers, Cement Masons, Ironworkers, Carpenters and Construction Teamsters.

Thank you to SCAG for the hard work and forward thinking that has gone into the RTP/SCS planning process. Thank you also for the opportunity to provide comments on behalf of SCCA.

SCCA appreciates SCAG's goals of optimizing system performance (including preservation and maintenance), investing in completing transportation system gaps and strategic investments to expand the system as the population grows.

As you know, not only is southern California's population expected to grow dramatically over the next 25 years, but according to the American Road & Transportation Builders Association freight movement is projected to double. Protecting our existing transportation infrastructure and making strategic investments to expand infrastructure will be key to safely moving people and goods for decades to come.

According to the Construction Industry Research Board, based in Burbank, total construction in California dropped from \$98 billion in 2005 down to \$42.4 billion in 2010. This represents a 57 percent reduction in total construction activity in the state. The market low was 2009 with total construction at \$39 billion.

California construction employment has a direct correlation with total construction activity. According to the California Employment Development Department, Labor Market



\* Deceased

Information Division, California construction employment dropped from 933,700 in 2006 to 559,800 in 2010. That represents a 40 percent reduction in construction employment over a five year period.

The RTP calls for \$524.7B in infrastructure investment which will significantly boost construction activity in southern California. The SCCA supports this plan. However, we echo the concerns voiced at the February 2 Public Input Hearing by the Southern California Leadership Council and we would like to see more clarity on the \$219.5B in new revenue sources outlined in the plan.

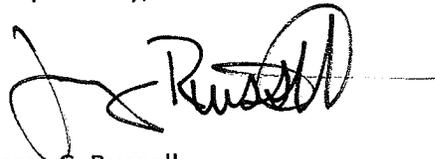
According to the American Road & Transportation Builders Association in Washington, D.C., "Greenfield" infrastructure projects can take up to 19 years from concept to construction due to the National Environmental Policy Act and California Environmental Quality Act processes.

Therefore, SCCA has concerns with the number of mitigation measures in the PIER. We encourage SCAG to further examine the economic impacts of mandates on local governments and contractors, and the potential for project delays and future litigation.

SCCA supports a balanced approach to providing multi-modal transportation alternatives to southern California. We encourage SCAG to ensure a truly balanced approach that balances transit, highway, freight rail, bridge and roadway improvements with smart land use strategies that encourage walking, biking and other transportation options.

Again, thank you for all of your hard work in developing the RTP and SCS. We look forward to continuing to work with you on sustainable solutions that work for everyone.

Respectfully,

A handwritten signature in black ink, appearing to read "Larry C. Russell", with a horizontal line extending to the right.

Larry C. Russell  
Executive Vice President



# CITY OF NEWPORT BEACH

## COMMUNITY DEVELOPMENT DEPARTMENT *Planning Division*

February 14, 2012

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:

The following comments are offered on the draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (draft RTP/SCS) and the associated Appendices and draft Program Environmental Impact Report (draft PEIR).

We would like to commend SCAG and its staff who worked hard to prepare the draft RTP/SCS, the PEIR, and associated documents as this was a monumental task. We appreciate the continued cooperation of SCAG staff throughout this process and the many mentions throughout the document where the RTP/SCS expressly states that it incorporates the Orange County Sustainable Communities Strategy (OC SCS) into the RTP/SCS document.

The City of Newport Beach has reviewed the draft RTP/SCS and the draft PEIR. However, the length of the comment period was not adequate to allow for a comprehensive review and formulation of detailed comments.

We are aware of the review completed by the Orange County Council of Governments (OCCOG) and the concerns addressed in the letter from OCCOG are consistent with the City of Newport Beach's concerns.

It is requested that the adoption of the growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs. Planning documents need to be flexible. As time passes, what is possible and feasible for any given project changes. These changes can be due to market conditions, new information or data, or infrastructure available that may shift when and where development is possible. Smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell would limit jurisdictional control over land use.

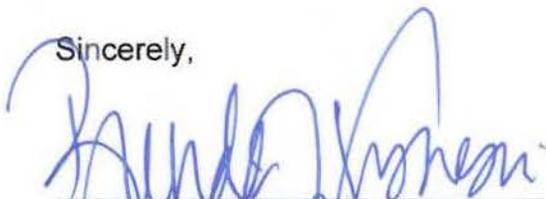
The OCCOG Board approved the update to the OCP-2010 dataset used in the OC SCS. OCP-2010 Modified was officially approved by the OCCOG Board on January 26, 2012, and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with

SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011, which should be incorporated into the 2012 RTP/SCS, PEIR, and related documents. To be consistent with the MOU on subregional delegation between OCTA, OCCOG, and SCAG, all documents, tables, maps, narratives, modeling runs, PEIR alternatives (including Alternate C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.

As indicated in the PEIR on page 1-6, state law states that it is appropriate to indicate in mitigation measures that they "can and should" be implemented. Under the law, this is explained as the entity has the jurisdiction to implement the measures and, therefore, should implement it. However, due to the assertions throughout the PEIR that mitigation measures have been determined to be feasible, the term "can" could be interpreted to read that the measures are also feasible. In order to make it clear that the mitigation measures are a menu of options for which feasibility has not been established for any given project, it is requested that the "can and should" language be changed in all mitigation measures identifying entities other than SCAG to read "should consider where practical and feasible". It would be appropriate to identify on page 1-6 in the discussion of this language that for all mitigation measures it is assumed by the draft PEIR that the entities identified to implement the mitigation do have the authority to do so.

Again, we thank SCAG for all of the time and effort put into this process. If you have any questions, feel free to contact me at 949-644-3297 or [bwisneski@newportbeachca.gov](mailto:bwisneski@newportbeachca.gov).

Sincerely,



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Brenda Wisneski, Deputy Director  
Community Development Department  
City of Newport Beach



February 14, 2012



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



**Re: Draft 2012 Regional Transportation Plan and Program Environmental Impact Report**

Dear Mr. Ikhata:

The Orange County Transportation Authority, Transportation Corridor Agencies, Orange County Council of Governments, Association of California Cities - Orange County, County of Orange, Orange County Business Council, and undersigned organizations representing local agencies thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG's) Draft 2012 Regional Transportation Plan (RTP) and associated Program Environmental Impact Report (PEIR). We acknowledge SCAG's effort to deliver the draft documents, and your commitments to incorporate the Orange County Sustainable Communities Strategy (OC SCS) and Long-Range Transportation Plan (LRTP) as presented to you.

Each of our agencies has prepared individual comment letters; however, this letter emphasizes some issues of common concern raised through our collaborative review.

- Induced growth discussions incorrectly imply a lack of coordination between land-use and transportation planning agencies and are contrary to the balanced plans provided through the LRTP and OC SCS collaboration process. Please state that land-use plans and transportation projects identified in the OC SCS and LRTP are balanced and, if necessary, clarify under what circumstances "induced growth" may occur.
- The preliminary determination that all of the mitigation measures are feasible is not supported within the draft documents. Moreover, the "can and should" language incorrectly implies that mitigation measures are feasible for the identified agencies. SCAG should provide a clear statement that all mitigation measure recommendations are advisory and replace the "can and should" phrase with "may" when referencing mitigation measures.
- Multiple mitigation measures appear to exceed SCAG's authority and responsibilities for implementation. These mitigation measures should be restated or removed as appropriate.
- New revenue sources and innovative financing strategies used to demonstrate financial constraint can have significant impacts on businesses and the economy that must be clearly understood before advancing. In fact, the RTP



Mr. Hasan Ikhata  
February 14, 2012  
Page 2

vision statement recognizes the linkages between economy and the regional transportation system. Specifically, details on how any new user fees would be further defined, evaluated, and advanced must be evaluated through a full economic analysis prior to final adoption of the RTP. In addition, this analysis should demonstrate, by county, the need for new revenues, how the new revenues are proposed to be invested, and how a county-level return to source mechanism can be ensured.

We encourage SCAG to pay particular attention to these issues and the specific comments submitted by the respective agencies and ensure that they are appropriately addressed in the RTP and PEIR revisions.

Regards,



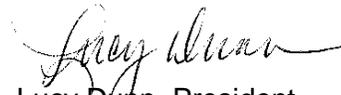
Will Kempton, Chief Executive Officer  
Orange County Transportation Authority



Tom Margro, Chief Executive Officer  
Transportation Corridor Agencies



Tom Mauk, Chief Executive Officer  
County of Orange



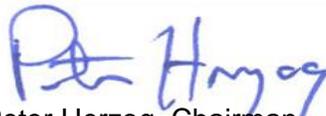
Lucy Dunn, President  
Orange County Business Council



Lisa Bartlett, President  
League of California Cities,  
Orange County



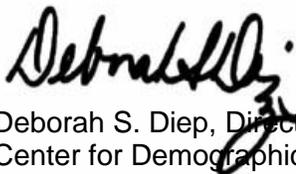
Rich Freschi, President  
Independent Special Districts of  
Orange County



Peter Herzog, Chairman  
Orange County Council of Governments



Lacy Kelly, Chief Executive Officer  
Association of California Cities -  
Orange County



Deborah S. Diep, Director  
Center for Demographic Research

c: OCTA Board of Directors  
OCCOG Board of Directors  
Orange County City Managers Association



RON CHAPMAN, MD, MPH  
Director & State Health Officer

State of California—Health and Human Services Agency  
California Department of Public Health



EDMUND G. BROWN JR.  
Governor

January 19, 2012

Christopher P. Ganson, Senior Planner  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Dear Mr. Ganson,

We welcome the opportunity to comment on the Sustainable Community Strategies (SCS) that have recently been presented in draft or final formats by the large Metropolitan Planning Organizations. Although the California Department of Public Health does not have a regulatory role in the SB375 process, there are a number of compelling public health interests in the SCSs because of the documented health impacts of housing and transportation in combination with economic development, education, and their interactions to create healthy community environments. As the convener of the Strategic Growth Council's Health in All Policies Task Force, CDPH is working with other State agencies to optimize opportunities to improve public health and sustainability. CDPH staff has also played an educational and technical advisory role in some MPOs' discussions of performance targets and methodologies to assess project performance. CDPH also routinely interacts with local public health departments around the state, many of whom have become involved in regional SCS planning.

Our general and specific comments are detailed in the attached pages. We do note, however, that there are several health issues that fall outside of the current framework of SCSs but are concerns CDPH believes needs more attention. Although greenhouse gas reduction is a goal of the SCSs, climate change will increase risks from higher temperatures on the backdrop of an increasingly urbanized California. We feel there is a critical need to integrate urban heat island (UHI) mitigation strategies into regional and local plans that will implement transit oriented development (TOD) and in-fill development so that UHI risks are reduced as new development takes place. Access to health-promoting features of the built environment, including food systems, parks, and green space also should be integrated into planning.

Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Linda Rudolph, M.D., M.P.H.  
Deputy Director, Center for Chronic Disease Prevention and Health Promotion

## **Comments by the California Department of Public Health on the Sustainable Community Strategies (SCS) Process and Plan Content**

### **General Comments**

Health is a critical component of sustainable communities. The California Department of Public Health encourages regional planning organizations to embrace the concepts outlined in the Healthy Community framework developed by the Strategic Growth Council's Health in All Policies Task Force.<sup>1,p21</sup> Many strategies that increase community sustainability can also support improved health outcomes. For example, policies that support active transportation help Californians incorporate more health-promoting physical activity into their lives, while also advancing goals to achieve greenhouse gas emission reductions. Infill development can help to reduce urban sprawl, reduce greenhouse gas emissions, and support location-efficient housing that promotes active transportation and allows workers to reap both economic and health benefits. Good health is critical for economic sustainability, increasing workforce participation and productivity, and slowing the ongoing rise in medical care expenditures, which diverts resources from other State priorities such as education or investments in green energy.

CDPH staff has reviewed the drafts and final versions of SCSs updates to the Regional Transportation Plans of the 4 large MPOs and the following comments represent a high level synthesis. First, we must laud the MPOs for the diligent work that has gone into these documents, and each represents an improvement from the original RTPs. We note an increasing number of performance measures that go beyond the traditional health focus on traffic injuries and air pollution. We refer to physical activity from active modes of travel, including bicycling, walking, and public transit that includes active transport from and to transit destinations. Noise and other physical hazards are also getting more attention as health performance measures. We also note that discussions of equity increasingly recognize that health inequities are caused and exacerbated by built environment factors and the uneven distribution of community resources. We are supportive of these developments which will deepen the appreciation of how public health is embodied in the many actions outside the field of health or health care.

### **Specific Recommendations**

We have several recommendations that are based on existing trends in the SCSs and recent scientific developments in the transportation and public health fields.

1. Activity time in active transport (walking, bicycling, etc.) is indispensable as a health-related transportation performance measure (e.g., mean daily minutes per person of walking and bicycling). Health co-benefits of active transport in one of the large MPOs (Metropolitan Transportation Commission, MTC) has recently been quantified<sup>2</sup> and the potential for reducing chronic disease and greenhouse gases appears to be large on an absolute scale and far larger than co-benefits from fine particulate matter reductions, which are a traditional focus of health effects. These findings are consistent with emerging evidence from studies of other regions of the United States, London, Barcelona, and the Netherlands.<sup>3-7</sup> Attempts to monetize health co-benefits from active transport suggest savings of billions of dollars in health care costs and the value of statistical lives saved.<sup>5</sup>

2. MPOs should consider new tools that have recently become available to quantify the health co-benefits of active transport in SCS scenarios and projects. This fills a gap in project performance assessment at most MPOs. One such tool co-developed by the CDPH, MTC, the Bay Area Air Quality Management District and other researchers is called the Integrated Transport and Health Impacts Model (ITHIM), which was used to quantify the health co-benefits of active transport and low carbon driving in the San Francisco Bay Area. This tool could function as a post processor to travel demand models that generate miles traveled and activity times by mode. Modelers at several large MPOs are already exploring how it can be used to complement their methods for project performance assessment.
3. As tools such as ITHIM become available to MPOs, health co-benefits can be used as a criterion for a unique project category that *a priori* could get a high priority score in the project assessment methodologies used by MPOs.
4. Likewise, using these tools, health co-benefits can be used as a criterion to screen projects for cost-benefit and other in-depth analysis. In some MPOs current practice is to screen projects based on cost, so that only high cost projects get quantitative assessment. This would allow projects with large health co-benefits to also get additional scrutiny in cost-benefit analyses.
5. Equity/inequity in RTPS is currently framed using title VI of the Civil Rights Act, concepts of "no disparate impacts" and "increase access (to affordable housing/transit) to poor people", participation of communities of concern, environmental justice. In the development of SCSs some MPOs have been exposed to a health-based approach which explicitly calls for ways to narrow existing differences in health status and of determinants of health. The Sustainable Transportation Council (LEED-like approach to rating transportation systems) is considering a goal area in its transportation rating system that explicitly considers reducing health disparities.<sup>8</sup> This is a promising approach that deserves more attention.
6. Local health departments are highly interested and would benefit from mechanisms that enhance their participation in SCS development and follow-up. We noted with interest that SANDAG has a standing Public Health Advisory Committee in which the San Diego County Health Department is a partner, and our staff was able to attend one of their meetings. National organizations like the Transportation Research Board have recently created standing health subcommittees with an expanded focus. It is worth exploring ways local health departments and others interested in public health and equity can stay engaged on an on-going basis.

This is particularly germane to a multidisciplinary approach to address the multiple health issues and the complexity of health impacts. In this setting expertise could be leveraged to explore the potential consequences of different scenarios and SCSs in the context of health risks and benefits, addressing air quality, physical activity, access to health promoting resources (e.g., transportation, food, employment, education), noise, injuries, social networks, etc. for the regional population and vulnerable subgroups.

## References

1. Health in All Policies Task Force. *Report to the Strategic Growth Council*. Sacramento, CA: Strategic Growth Council; 2010 ([http://sgc.ca.gov/hiap/docs/publications/HiAP\\_Task\\_Force\\_Report.pdf](http://sgc.ca.gov/hiap/docs/publications/HiAP_Task_Force_Report.pdf)).

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3. de Hartog JJ, Boogaard H, Nijland H, Hoek G. Do the health benefits of cycling outweigh the risks? *Environ Health Persp*. 2010;118:1109–1116.
4. Grabow ML, Spak SN, Holloway T, Stone B, Mednick AC, Patz JA. Air quality and exercise-related health benefits from reduced car travel in the Midwestern United States. *Environ Health Persp*. 2011;<http://dx.doi.org/10.1289/ehp.1103440>.
5. Rabl A, de Nazelle. Benefits of shift from car to active transport. *Transport Pol*. 2012;19:121-131.
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7. Woodcock J, Edwards P, Tonne C, Armstrong BG, Ashiru O, Banister D, et al. Public health benefits of strategies to reduce greenhouse-gas emissions: urban land transport. *Lancet*. 2009;374:1930-1943.
8. Rogers K, ed. *Sustainable Transportation Access Rating System (STARS). Pilot Project Application Manual Version 1.1*. Portland OR: North American Sustainable Transportation Council and the Portland Bureau of Transportation; 2011.



## Transportation Corridor Agencies

February 13, 2012

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

RE: Comments on the Draft 2012 Regional Transportation Plan/  
Sustainable Communities Strategy and Program Environmental Impact Report

Dear Mr. Ikhata:

The Foothill/Eastern Transportation Corridor Agency and the San Joaquin Hills Transportation Agency (TCA) appreciates the opportunity to review and provide comments on the Draft 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and associated Draft Program Environmental Impact Report (PEIR). TCA commends the SCAG staff for the tremendous amount of work and effort in putting these documents together. TCA also recognizes and supports the timely adoption of the RTP/SCS to enable the Southern California region to proceed with the planning and implementation of regionally significant transportation projects. Further, TCA recognizes that the SCS is particularly important for the region to meet its state mandated greenhouse gas (GHG) emissions reduction targets for 2020 and 2035.

Please find below TCA's specific comments on both the draft RTP/SCS and PEIR.

### **DRAFT 2012-2035 RTP/SCS**

#### **Page 23, Vision, Transportation Demand Management**

Transportation pricing is not identified as part of the RTP/SCS "vision" either as a transportation demand management method or as a financing tool, even though it is clearly a component of the transportation plan and financial plan for implementation. The Orange County SCS includes a description of the current and planned priced transportation network that should be adapted to address the entire region.

#### ***Recommended Clarification:***

Add information from the Orange County SCS (pages 126 and 127 of the Subregional Sustainable Community Strategies Technical Appendix) that describes the existing and

*Thomas E. Margro, Chief Executive Officer*

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planned inter-operable priced transportation network in the region, including toll roads, express lanes and high occupancy toll (HOT) lanes. The text can be expanded to address HOT lanes, toll facilities, express lanes and tolled truck lanes in the region as a whole, and should include the following points:

- Tolled centerline miles in the region will increase from 61 in 2008, to 408 in 2035, including toll roads, express lanes, HOT lanes, and tolled truck lanes.
- Priced lanes provide flexibility and options as part of the congestion relief toolbox of measures designed to help meet sustainability and emission reduction goals related to SB 375 and other state and federal mandates.
- “Priced facilities are an especially important tool for providing intra-county, inter-county and interregional capacity.”
- “The existing priced transportation network serves the locations where major employment and housing growth are projected to occur.”
- “Toll roads and express lanes charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion provides improved and more efficient mobility with fewer air pollutants and greenhouse gas (GHG) emissions caused by congestion.”
- “The toll road system is designed to interrelate with transit service. The toll roads can accommodate Bus Rapid Transit and express bus service, and toll road medians are sized and reserved to provide the flexibility for future transit, if appropriate.”
- Priced facilities such as the Orange County toll roads are privately funded. This insures that these facilities can relieve congestion and associated air pollution and GHG emissions without further stressing limited state, federal and local transportation funding resources.

**Page 42, Major Highway Completion Projects, Table 2.2**

SR-241 (ORA052) is identified in Table 2.2 as a major highway completion project. However, the completion year is listed as 2020-2030. Although widening will occur in the 2020 to 2030 timeframe, the official project description identifies the completion date as 2030.

***Recommended Clarification:***

- In Table 2.2, we request that the completion date for SR 241 be clarified as 2030, consistent with the project description for ORA052.
- In the interest of establishing that some major highway projects in Table 2.2 provide emissions reduction benefits without burdening limited federal, state and local

funding resources, we request the following clarifying footnote: *SR 241 is a privately funded Transportation Control Measure.*

**Page 56, Express/HOT Lane Network**

This appears to be the only “priced transportation” discussion in the transportation investments chapter. It does not identify how many miles of priced lanes exist now, or how much that network will be expanded in the plan. Toll roads are included in the priced transportation network, along with express lanes, and HOT lanes, but are not included in the discussion. However, TCA’s Toll Roads are depicted in Exhibit 2.6, Regional HOT Lane Network. The terminology should be clarified.

***Recommended Clarification:***

- Retitle this section, “Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network.”
- Table 2.6 should be retitled “Express Lanes, HOT Lanes and Toll Roads”
- The text should provide brief definitions of each type of facility that makes up the priced transportation network, as Express Lanes, Toll Roads and HOT Lanes each operate differently.
- The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.
- The text should discuss that all priced facilities in the SCAG region insure interoperability by using a common technology, FasTrak, to collect user fees.
- The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing, which is beneficial to reduced criteria pollutants and GHG emissions reductions.

**Page 76, Conservation Planning Policy**

The description of this policy requires clarification to express the intent of SCAG’s Energy and Environment Policy Committee and the coalition of more than 20 public, non-profit and private sector interests, including TCA that urged SCAG to include it.

***Recommended Clarification:***

Add a paragraph that explains why the conservation program benefits GHG emissions and other criteria pollutants reductions. Specifically, in addition to meeting Safe, Accountable, Flexible, Efficient Transportation Equity Act: A legacy for Users (SAFETEA-LU) requirements, the open space lands conservation program would use natural land acquisition to sequester (store) carbon, avoid GHG emissions, and reduce

vehicle miles traveled (VMT). This proposed program allows for early implementation and mitigation opportunities. Jurisdictions would have the option to invest early in this open space strategy which offers immediate GHG emissions avoidance benefits, while simultaneously proceeding with the longer term and planning intensive projects to build transportation centers near existing residential areas, or employment centers near transit stations, etc.

Suggested steps to develop a regional conservation planning policy should be expanded to include the following key points supported by SCAG's Energy and Environment Committee and the coalition that recommended this program:

- Build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA's Measure M Mitigation Program, and TCA's open space mitigation program, which has protected 2,200 acres in perpetuity to date.
- Pursue open space conservation in a voluntary manner, working with willing private sector landowners.

#### **Page 78, Greenhouse Gases**

The draft document states that "The transportation sector, primarily, cars and trucks that move goods and people, is the largest contributor [to greenhouse gas (GHG) emissions] with 36.5 percent of the State's total GHG emissions in 2008. On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total." This statement covers only part of the transportation system's GHG emissions role. The text must recognize projects that reduce transportation network GHG emissions by relieving congestion and insuring free-flow conditions.

Because GHG emissions from vehicles increase in stop-and-go traffic, congestion relief projects that eliminate bottlenecks and maintain free-flow conditions actually reduce transportation network GHG emissions, much as Transportation Control Measures are transportation projects that reduce criteria pollutants. Further, the SB 375 Regional Targets Advisory Committee (RTAC) recommends tracking the performance of such strategies "to smooth extreme congestion to more carbon-friendly speeds" in its final report to the California Air Resources Board.

#### ***Recommended Clarification:***

Insert the following statements on page 78:

- Congestion relief projects reduce transportation network GHG emissions, which otherwise result from idling.
- Consistent with the SB 375 RTAC's recommendation in its final report to the California Air Resources Board, the RTP/SCS includes projects and strategies designed "to smooth extreme congestion to more carbon-friendly speeds."

- A subset of projects included in the Draft RTP/SCS reduce GHG emissions by providing relief of existing and projected congestion. These include toll roads, express lanes, HOT lanes, high occupancy vehicle (HOV) lanes, and dedicated truck toll lanes.
- Congestion pricing is a powerful transportation demand management tool incorporated in the Draft RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed transportation facilities while reducing the region's GHG emissions associated with vehicle trips.
- Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions.
- Other examples of projects that reduce GHG emissions on the regional transportation network include express lanes, HOT lanes, HOV lanes and dedicated truck toll lanes for goods movement.

#### **Page 79, Air Quality**

Transportation Control Measures (TCMs) are mentioned as mitigation measures, but are not defined or illustrated. The importance of TCMs needs to be clarified and expanded to clearly communicate their air quality role in the RTP.

##### ***Recommended Clarification:***

- Provide a brief description of projects that qualify as TCMs.
- Explain the role of TCMs in reducing emissions.
- Provide a reference to the list of TCMs contained in the Conformity Technical Report.

#### **Page 86, Financial Plan, Introduction**

The draft document states that "We have successfully implemented toll systems in the past with the Transportation Corridor Agencies' network of toll roads and the SR-91 Express Lanes in Orange County. This kind of innovation in transportation continues as neighboring counties within our region consider a broader network of toll systems." However, the statement needs to clarify the financial planning importance of privately funded toll facilities.

##### ***Recommended Clarification:***

Priced transportation facilities also provide the opportunity for financial innovation. The Orange County toll roads (SR 73, SR 133, SR 241, and SR 261) are privately funded. They provide congestion relief and associated air pollution and GHG emissions reduction without further stressing limited federal, state, and local transportation funding.

**Page 92, Core Revenues, Regional Revenues**

Table 3.6, Regional Revenues, identified federal, state and local sources of transportation funding for the plan. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, expansions, and new tolled facilities that are privately funded are included in the plan and in the total cost of the plan.

Accurately describing the extent of private funding is an important public disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding.

***Recommended Clarification:***

- Clarify in the text the percentage of total funding contributed by private sources. This sum should include the privately funded Orange County toll roads (SR 73, SR 133, SR 241, and SR 261).
- A companion pie-chart, similar to Table 3.6, showing the split between public and private funding would also clarify this point.

**Page 103, Table 3.5 2012 RTP Revenues (in Nominal Dollars, Billions)**

Until such time that the TCA Board reviews, considers, and/or approves a VMT-based user fee; TCA is not in a position to support an increase in fees as proposed in the draft Plan. Furthermore, the draft does not clarify how the cost of a proposed new VMT fee, increased gas tax fee, tolls and user fees would layer over each other. It appears that they would accumulate for individual drivers, with a potentially significant economic impact on drivers and households. Drivers paying to use toll roads, express lanes and HOT lanes would be paying twice for the same mileage.

**Page 145, Exhibit 4.17, Land Use Pattern Orange County (2035)**

The southerly portion of SR 241 (ORA052), from Oso Parkway to the San Diego County border, has been inadvertently left off this map.

***Recommended Clarification:***

- Please show the SR 241 alignment on Exhibit 4.17 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS.

**Page 161, Performance Outcomes**

This text should clearly state that performance measures and outcomes are not intended to apply to individual areas or projects, but rather to the region as a whole.

***Recommended Clarification:***

We recommend that the following clarification be inserted:

- Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.

**Page 207, Strategic Plan**

SCAG assumes \$100 billion will be available from a future VMT fee starting in 2025, but funding for mileage-based user fee demonstration projects and implementation strategies are not included in the constrained RTP/SCS; they are listed in the unfunded Strategic Plan. The TCA Board has made no decision on the use of VMT fees and until such time is unable to support its use in the proposed in the draft Plan.

**Highways and Arterials Technical Report**

**Page 15, Express/ High Occupancy Toll (HOT) Lane Network.**

As with the comment on page 57 of the main RTP/SCS document, the technical report should clearly include toll facilities in the description of projects included in this category. Orange County toll roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission free-flow capacity and funding the construction and operation of the facility. Toll roads integrate with express lane and HOT lane facilities via the common FasTrak technology that allows inter-operability and convenience for drivers.

***Recommended Clarification:***

- Retitle this section, “Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network.”
- Table 2.6 should be retitled “Express Lanes, HOT Lanes and Toll Roads”
- The text should provide brief definitions of each type of facility that makes up the priced transportation network, as express lanes, toll roads and HOT lanes each operate differently.
- The text should discuss that all priced facilities in the SCAG region ensure inter-operability by using a common technology, FasTrak, to collect user fees.
- The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities.
- The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing which is beneficial to reduced criteria and GHG emissions reductions.

**Performance Measures Technical Report**

**Page 2, discussion of types of performance measures.**

As with the comment on page 160 of the main RTP/SCS document, the text must make clear that the performance indicators are intended to be applied to the RTP/SCS at the regional level and are not proposed for project-specific application.

***Recommended Clarification:***

We recommend that the following clarification be inserted:

- Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.

**SCS Background Documentation**

**Pages 36 and 37, Land Use Pattern Maps for 2020 and 2035.**

Both of these maps are inconsistent with transportation network maps in the document and do not include SR 241 (ORA052), specifically called out in the RTP as a TCM and priced transportation project in southern Orange County.

***Recommended Clarification:***

Please show the SR 241 alignment on the Land Use Pattern Maps for 2020 and 2035 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS.

**Page 54, Pricing and Vehicle Policy Assumptions.**

This discussion only refers to a 2-cent per mile VMT fee; the Plan proposes a 5-cent per mile fee. This inconsistency should be eliminated.

***Recommended Clarification:***

- Amend the reference to a 2-cent VMT fee to a 5-cent per mile VMT fee starting in 2025, consistent with the RTP/SCS main document.

Add the following sentence:

- Toll roads, express lanes and HOT lanes charge varying tolls per mile for use of their facilities. Tolls are project-specific and typically vary by time of day and day of the week. Tolls collected for existing toll roads in Orange County are dedicated to operational expenses and retiring the bonds issued for construction.

### **Transportation Conformity Technical Report**

#### **Page 14, Toll Roads**

The discussion of toll road assumptions specifically mentions express lanes and HOT lanes, but not tolled facilities such as existing toll roads SR 73, SR 241, SR 133 and SR 261 in Orange County.

#### **Recommended Clarification:**

- SR 241 should be added to Table 6 as a tolled facility and the effect of the toll charges on it should be incorporated into the highway assignment procedure.
- Table 6 should be retitled appropriately to include “Express Lane, HOT Lane and Toll Road Networks.” This change should also be made in the main RTP/SCS document.

### **Transportation Security Technical Report**

#### **General**

This report addresses the need for the transportation system to enhance emergency preparedness, and transportation security and preparedness. Projects that enhance the region’s security are not identified.

#### ***Recommended Clarification:***

Provide illustrations of transportation projects needed in the RTP/SCS to improve transportation security. For example, the southerly extension of SR 241 provides an alternative route connecting the SCAG and San Diego Association of Governments coastal regions, which have very high current and projected travel volumes. This route will ease future projected congestion to ensure critical capacity for access and evacuation in times of environmental or other emergencies, such as earthquakes, wildfires, traffic accidents, and potential nuclear threats at the San Onofre plant. The need for an alternative route was recently illustrated by the lack of evacuation capacity from the 2007 North San Diego County wildfires.

### **DRAFT PROGRAM EIR**

#### **General**

The Draft PEIR sets forth 500 mitigation measures that SCAG states are “feasible” and reasonable to assume that they will be implemented. Further, it is difficult to sort through these voluminous mitigation measures to identify those that are mandatory vs. advisory and those that apply to transportation projects as opposed to other types of developments. This can be improved by reformatting and clarifying the proposed mitigation measures as follows:

#### ***Recommended Clarifications:***

- Provide a clear statement to the following effect: All mitigation measure recommendations to project sponsors and agencies are advisory. Lead agencies are

responsible for identifying and addressing those measures they deem practical and feasible, or applicable to specific projects.

- Sort out mitigation measures so that those that are mandatory upon SCAG appear first in each category and can be easily distinguished from Best Management Practices or Best Available Control Measures that SCAG is recommending to project sponsors and other agencies.
- For mitigation measures that simply restate existing regulatory agency requirements or recommendations, e.g. California Department of Fish and Game survey protocols and mitigation requirements, reference the specific regulation and include in the description “or successor regulation or guideline” so that as time moves forward the measure does not recommend out of date regulations or guidance.

**Page 3.6-15 and 17 Greenhouse Gas Emissions, Transportation Network Improvements.**

On page 3.6-15, the Draft PEIR states that the transportation sector is a major source of California’s greenhouse gases. Further, on page 3.6-18, the discussion cites information on the GHG emissions from new vehicle trips. However, in both places, the document does not clarify that certain transportation projects reduce greenhouse gases by virtue of their design, location and operation. Similar to the way that Transportation Control Measures reduce precursors to ozone, projects that reduce congestion and idling reduce GHG emissions from the regional transportation network. The PEIR must explain the relationship between GHG emissions and congestion relief, and the components of the RTP that provide congestion and idling relief on the regional network.

***Recommended Clarification:***

Consistent with our recommended clarification for page 78 of the Draft RTP/SCS document, the PEIR text should state the following on pages 3.6-15 and 3.6-18:

- Congestion relief projects reduce transportation network GHG emissions due to idling.
- Consistent with the SB 375 RTAC’s recommendation in its final report to the California Air Resources Board, the RTP/SCS includes projects and strategies designed “to smooth extreme congestion to more carbon-friendly speeds.”
- A subset of projects included in the Draft RTP/SCS reduce GHG emissions by providing relief of existing and projected congestion. These include toll roads, express lanes, HOT lanes, HOV lanes, and dedicated truck toll lanes.
- Congestion pricing is a powerful transportation demand management tool incorporated in the Draft RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed

transportation facilities, while reducing the region's GHG emissions associated with vehicle trips.

- Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions.
- Other examples of projects that reduce GHG emissions on the regional transportation network include express lanes, HOT lanes, HOV lanes and dedicated truck toll lanes for goods movement.

## Maps 2, Project Description

### General, SR 241 Missing from 2035 Base Maps

Please ensure that all 2035 base maps include the southerly extension of SR 241, For example, Map 2.13, 2035 Grade Separation Projects, does not show SR 241, which will be completed by 2030, on the base map, while it is depicted on Map 2.6 and 2.8. Map 2.19, Land Use Pattern in Orange County, does not depict SR 241; this is accurate only if the map is intended to show 2008 land use; SR 241 should be included in all maps for 2020 and 2035.

#### ***Recommended Clarifications:***

Consistent with the transportation modeling network and TCM timely implementation report, show SR 241 as part of the 2035 base map for all transportation maps in the PEIR. Specifically, add SR 241 to Map 2.13 and Map 2.19.

TCA thanks you in anticipation of your written responses to these comments. We look forward to the amendments in the final 2012-2035 RTP/SCS and PEIR to incorporate the recommended changes. Should you have any questions or require any clarification regarding these comments, please feel free to contact Ms. Valarie McFall, Director, Environmental Services at 949.754.3475 or via email: [vmcfall@thetollroads.com](mailto:vmcfall@thetollroads.com).

Sincerely,



Scott Schoeffel, Chair  
San Joaquin Hills Transportation Corridor  
Agency



Bill Campbell, Chair  
Foothill/Eastern Transportation Corridor  
Agency

cc: Jacob Lieb, SCAG, Manager of Environmental and Assessment Services  
TCA Board of Directors



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

February 14, 2012

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

Dear Mr. Ikhata,

The Governor's Office of Planning and Research (OPR) appreciates this opportunity to provide input on the Southern California Association of Governments (SCAG) 2035 Draft Regional Transportation Plan (RTP). This letter highlights aspects of SCAG's RTP that we think could inform other Metropolitan Planning Organizations' (MPOs') RTPs, and includes some suggestions for possible improvement. Additionally, we enclose comments shared with us by the California Department of Public Health.

Our comments highlight a number of achievements of the plan, and point to some opportunities for further improvement. The plan is grounded in empirical data, using performance measures to guide investment. These metrics are based on transparent modeling, and are broad enough to capture a number of factors important to decision-making. We also point to some opportunities to calculate other important metrics that could be added to even better inform decision-making. The plan also proposes a VMT fee for revenue generation; we suggest that in future analysis SCAG broaden discussion of its benefits and impacts. By showing a path of regional growth in a smaller urban footprint, it makes possible substantial habitat preservation and emissions reduction. We commend SCAG for the extensive technical analysis, policy development, and public outreach process which informed this document, achieving a 16 percent reduction of greenhouse gas emission (GHG) reductions by 2035, among the largest of any MPO's over that timeframe. The RTP estimates a reduction in congestion and an increase in active mode share as well. We look forward to working with SCAG as it proceeds with implementation of this plan.

## **Performance Based Planning**

We are encouraged by SCAG's efforts to develop a plan based on quantitative measures of projected outcomes, or "performance metrics". In this RTP, SCAG provides data and discussion that covers a broad range of stakeholder interests, enabling broadly informed decision-making. We encourage SCAG to continue to develop its capacity to employ sophisticated scenario modeling, and to use that information to enable even better-informed decision-making.

Models used in regional transportation planning are increasingly important in informing transportation and land use decisions. These decisions direct billions of dollars in infrastructure investments and influence regional and local growth patterns. Transparency of models is therefore a prerequisite to transparency in the planning process and decision-making. The 2010 California Regional Transportation Plan Guidelines require MPOs to "disseminate the methodology, results, and key assumptions of whichever models it uses in a way that would be useable and understandable to the public."

We encourage MPOs to display as much information as possible, including model inputs, to help members of both the lay and technical public understand and compare model assumptions and results. Similarly, the model code itself should also be made available to members of the technical public for analysis. Consistent with the Regional Transportation Plan Guidelines, SCAG has appropriately made its modeling work available for public review. We appreciate SCAG's efforts in providing this information.

## **Applying Performance Metrics to Inform Policy**

SCAG's RTP also relies on and discusses useful metrics, and provides clear descriptions of their meaning. One example of a clearly portrayed and useful metric in the SCAG RTP is "reliability." Figure 5.8 and Table 5.2 (p. 172) along with the accompanying narrative convey clearly the concept of reliability and its importance to an efficient transportation system. To explain reliability, the table relates variability in travel time to the time one must leave for a trip in order to have confidence in reaching a destination on time. This demonstrates the time lost by users of an unreliable facility.

Another useful metric in SCAG's RTP is "lost productivity" which measures the reduction in throughput resulting from congested roadways (Figure 5.5, p. 170). Use of this metric allows consideration of the potential benefits to the transportation system of transportation demand management measures. This presents an opportunity to discuss the potential effect of a VMT fee on the transportation system.

We suggest that SCAG provide additional context when using some metrics. For example, death rate listed per VMT (p. 19, fig 1.2) captures factors such as roadway design, but masks the safety benefits of reducing VMT. Similarly, metrics of delay (pp. 164-165) do not distinguish between long and short trips. Such metrics can penalize a short commute in traffic as compared to a long commute on the open highway.

Congestion metrics therefore do not capture the benefits to the transportation system of land use planning strategies that shorten trip lengths. While we believe the RTP would benefit from inclusion of trip length in the metrics used to describe the functioning the transportation network, we note that the RTP captures these by using separate land use metrics.

The RTP also uses safety and health metrics, such as collision rates by severity and by mode and tons of air pollutants emitted. The document provides important information by monetizing potential health benefits of air quality improvement (p. 30). We encourage SCAG to include another key metric, health benefits resulting from active transportation, such as walking and bicycling, in the evaluation. Please see the section “Quantify the Benefits of Active Transportation” below for further discussion.

SCAG’s RTP appropriately describes several key co-benefits in the RTP (pp. 175-176). Further, the RTP also quantifies and monetizes those benefits so that they can be considered in cost benefit analyses. We encourage SCAG to clarify how those co-benefits are factored into the decision-making process, and also to expand the scope of co-benefit analyses in its future planning processes.

### **A Vehicle Miles Traveled Fee: a Funding Source with Potential Additional Benefits**

The SCAG region has been a pioneer in the use of roadway tolling in California. Studies suggest that roadway tolling can provide a combination of revenue enhancement, system performance enhancement, human health benefit and environmental benefit. We appreciate SCAG’s efforts in modeling and evaluating a VMT Fee as part of the RTP-SCS analysis.

As described in the RTP-SCS (p. 170), overloading a roadway substantially reduces vehicle flow. This in turn reduces the capacity of the roadway at exactly the time that capacity is most needed. One short-run solution is to build additional capacity, but building capacity is costly and the congestion relief is usually temporary. SCAG’s consideration of effects of a well-administered VMT fee, including reducing congestion, and possible co-benefits to human health and the environment (e.g. reducing GHG emissions, improving air quality, and reducing collisions), is beneficial for decision-makers and the public. We appreciate SCAG’s work in this area.

### **Quantify the Benefits of Active Transportation**

In a letter commenting on RTP-SCS development, the California Department of Public Health points out that “...the potential for reducing chronic disease and greenhouse gases appears to be large on an absolute scale, and far larger than co-benefits from fine particulate matter reductions, which are a traditional focus of health effects” (letter enclosed).

We note that the RTP highlights the link between active transportation and human health (p.30). We recommend that future planning efforts quantify health benefits of

active transportation, so those benefits can be more specifically factored into the transportation planning process. We note that the RTP includes discussions delineating active mode share and accident/fatality rate for cyclists and pedestrians, and elsewhere in the document the expenditure share on active transportation. We recommend that these factors be considered together with active mode health benefits for a comprehensive analysis of this component of transportation plan.

### **System Preservation**

In an era of dwindling transportation budgets, some agencies are deferring roadway maintenance. But doing so leads to more serious wear and damage, and the repairs that are needed as a result are much more expensive than proactive maintenance would have been. For long-run fiscal health, it makes sense to fund full upkeep of existing roadway and highway infrastructure before building more capacity. In this light, we appreciate SCAG's commitment of \$217 Billion (nearly half of total expenditures) to system preservation, maintenance, and operation.

### **Protecting the Natural Environment**

The RTP discusses the direct impact of roadway construction and operation on sensitive species via road wildlife strikes (p. 78). We note that the development that will be served by these roads could have a much greater geographic footprint than the roads themselves. As a result, the RTP should consider the potential the indirect impact roadway construction can have on land development, and in turn the impact of development on habitat. We encourage SCAG's continued engagement and facilitation in implementation of regional conservation plans.

On page 174, the RTP presents the following definition of sustainability: "A transportation system is sustainable if it maintains its overall performance over time with the same costs for its users." The RTP should use a broader definition of sustainability that encompasses the environmental, social and economic metrics used elsewhere in the plan.

### **Implementation Monitoring Tracks Results of the Planning Process**

The RTP anticipates substantial achievement that will be measured by a number of metrics. In order to determine whether these anticipated achievements occur, we suggest SCAG employ an implementation-monitoring program. Such a program would assess the extent to which local jurisdictions within SCAG approve development in accordance with the plan. It would test the assumptions used in the planning process, allowing for corrections to the plan so that it can continue to track a course towards stated targets. Also, it would check the assumptions made in the planning process, allowing calibration with empirical results.

OPR again commends SCAG for developing a high quality RTP-SCS. We hope that our comments are helpful. We appreciate the opportunity to submit these comments, and to offer our assistance in RTP-SCS development and implementation. If you have any questions, please do not hesitate to contact me at 916-324-9236 or [chris.ganson@opr.ca.gov](mailto:chris.ganson@opr.ca.gov).

Sincerely,



Chris Ganson  
Senior Planner

For: Ken Alex  
Director

cc:  
Heather Fargo, SGC  
Linda Rudolf, CDPH  
Doug Ito, CARB  
Terry Roberts, CARB  
Garth Hopkins, Caltrans

Attached: Comments by the California Department of Public Health on the Sustainable Community Strategies (SCS) Process and Plan Content



RON CHAPMAN, MD, MPH  
Director & State Health Officer

State of California—Health and Human Services Agency  
California Department of Public Health



EDMUND G. BROWN JR.  
Governor

January 19, 2012

Christopher P. Ganson, Senior Planner  
Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Dear Mr. Ganson,

We welcome the opportunity to comment on the Sustainable Community Strategies (SCS) that have recently been presented in draft or final formats by the large Metropolitan Planning Organizations. Although the California Department of Public Health does not have a regulatory role in the SB375 process, there are a number of compelling public health interests in the SCSs because of the documented health impacts of housing and transportation in combination with economic development, education, and their interactions to create healthy community environments. As the convener of the Strategic Growth Council's Health in All Policies Task Force, CDPH is working with other State agencies to optimize opportunities to improve public health and sustainability. CDPH staff has also played an educational and technical advisory role in some MPOs' discussions of performance targets and methodologies to assess project performance. CDPH also routinely interacts with local public health departments around the state, many of whom have become involved in regional SCS planning.

Our general and specific comments are detailed in the attached pages. We do note, however, that there are several health issues that fall outside of the current framework of SCSs but are concerns CDPH believes needs more attention. Although greenhouse gas reduction is a goal of the SCSs, climate change will increase risks from higher temperatures on the backdrop of an increasingly urbanized California. We feel there is a critical need to integrate urban heat island (UHI) mitigation strategies into regional and local plans that will implement transit oriented development (TOD) and in-fill development so that UHI risks are reduced as new development takes place. Access to health-promoting features of the built environment, including food systems, parks, and green space also should be integrated into planning.

Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Linda Rudolph, M.D., M.P.H.  
Deputy Director, Center for Chronic Disease Prevention and Health Promotion

## **Comments by the California Department of Public Health on the Sustainable Community Strategies (SCS) Process and Plan Content**

### **General Comments**

Health is a critical component of sustainable communities. The California Department of Public Health encourages regional planning organizations to embrace the concepts outlined in the Healthy Community framework developed by the Strategic Growth Council's Health in All Policies Task Force.<sup>1,p21</sup> Many strategies that increase community sustainability can also support improved health outcomes. For example, policies that support active transportation help Californians incorporate more health-promoting physical activity into their lives, while also advancing goals to achieve greenhouse gas emission reductions. Infill development can help to reduce urban sprawl, reduce greenhouse gas emissions, and support location-efficient housing that promotes active transportation and allows workers to reap both economic and health benefits. Good health is critical for economic sustainability, increasing workforce participation and productivity, and slowing the ongoing rise in medical care expenditures, which diverts resources from other State priorities such as education or investments in green energy.

CDPH staff has reviewed the drafts and final versions of SCSs updates to the Regional Transportation Plans of the 4 large MPOs and the following comments represent a high level synthesis. First, we must laud the MPOs for the diligent work that has gone into these documents, and each represents an improvement from the original RTPs. We note an increasing number of performance measures that go beyond the traditional health focus on traffic injuries and air pollution. We refer to physical activity from active modes of travel, including bicycling, walking, and public transit that includes active transport from and to transit destinations. Noise and other physical hazards are also getting more attention as health performance measures. We also note that discussions of equity increasingly recognize that health inequities are caused and exacerbated by built environment factors and the uneven distribution of community resources. We are supportive of these developments which will deepen the appreciation of how public health is embodied in the many actions outside the field of health or health care.

### **Specific Recommendations**

We have several recommendations that are based on existing trends in the SCSs and recent scientific developments in the transportation and public health fields.

1. Activity time in active transport (walking, bicycling, etc.) is indispensable as a health-related transportation performance measure (e.g., mean daily minutes per person of walking and bicycling). Health co-benefits of active transport in one of the large MPOs (Metropolitan Transportation Commission, MTC) has recently been quantified<sup>2</sup> and the potential for reducing chronic disease and greenhouse gases appears to be large on an absolute scale and far larger than co-benefits from fine particulate matter reductions, which are a traditional focus of health effects. These findings are consistent with emerging evidence from studies of other regions of the United States, London, Barcelona, and the Netherlands.<sup>3-7</sup> Attempts to monetize health co-benefits from active transport suggest savings of billions of dollars in health care costs and the value of statistical lives saved.<sup>5</sup>

2. MPOs should consider new tools that have recently become available to quantify the health co-benefits of active transport in SCS scenarios and projects. This fills a gap in project performance assessment at most MPOs. One such tool co-developed by the CDPH, MTC, the Bay Area Air Quality Management District and other researchers is called the Integrated Transport and Health Impacts Model (ITHIM), which was used to quantify the health co-benefits of active transport and low carbon driving in the San Francisco Bay Area. This tool could function as a post processor to travel demand models that generate miles traveled and activity times by mode. Modelers at several large MPOs are already exploring how it can be used to complement their methods for project performance assessment.
3. As tools such as ITHIM become available to MPOs, health co-benefits can be used as a criterion for a unique project category that *a priori* could get a high priority score in the project assessment methodologies used by MPOs.
4. Likewise, using these tools, health co-benefits can be used as a criterion to screen projects for cost-benefit and other in-depth analysis. In some MPOs current practice is to screen projects based on cost, so that only high cost projects get quantitative assessment. This would allow projects with large health co-benefits to also get additional scrutiny in cost-benefit analyses.
5. Equity/inequity in RTPS is currently framed using title VI of the Civil Rights Act, concepts of "no disparate impacts" and "increase access (to affordable housing/transit) to poor people", participation of communities of concern, environmental justice. In the development of SCSs some MPOs have been exposed to a health-based approach which explicitly calls for ways to narrow existing differences in health status and of determinants of health. The Sustainable Transportation Council (LEED-like approach to rating transportation systems) is considering a goal area in its transportation rating system that explicitly considers reducing health disparities.<sup>8</sup> This is a promising approach that deserves more attention.
6. Local health departments are highly interested and would benefit from mechanisms that enhance their participation in SCS development and follow-up. We noted with interest that SANDAG has a standing Public Health Advisory Committee in which the San Diego County Health Department is a partner, and our staff was able to attend one of their meetings. National organizations like the Transportation Research Board have recently created standing health subcommittees with an expanded focus. It is worth exploring ways local health departments and others interested in public health and equity can stay engaged on an on-going basis.

This is particularly germane to a multidisciplinary approach to address the multiple health issues and the complexity of health impacts. In this setting expertise could be leveraged to explore the potential consequences of different scenarios and SCSs in the context of health risks and benefits, addressing air quality, physical activity, access to health promoting resources (e.g., transportation, food, employment, education), noise, injuries, social networks, etc. for the regional population and vulnerable subgroups.

## References

1. Health in All Policies Task Force. *Report to the Strategic Growth Council*. Sacramento, CA: Strategic Growth Council; 2010 ([http://sgc.ca.gov/hiap/docs/publications/HiAP\\_Task\\_Force\\_Report.pdf](http://sgc.ca.gov/hiap/docs/publications/HiAP_Task_Force_Report.pdf)).

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5. Rabl A, de Nazelle. Benefits of shift from car to active transport. *Transport Pol*. 2012;19:121-131.
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8. Rogers K, ed. *Sustainable Transportation Access Rating System (STARS). Pilot Project Application Manual Version 1.1*. Portland OR: North American Sustainable Transportation Council and the Portland Bureau of Transportation; 2011.

February 14, 2012

Mr. Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> floor  
Los Angeles, CA 90017

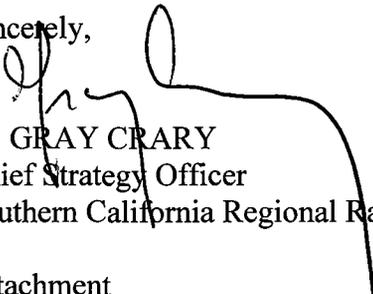
Dear Mr. Ikhata,

Subject: Southern California Regional Rail Authority Comments on the Draft 2012 RTP

Southern California Regional Rail Authority (SCRRA) appreciates the opportunity to comment on the 2010 Draft Regional Transportation Plan (RTP) prepared by the Southern California Association of Governments (SCAG). The document identifies key challenges facing the region, and underscores the need for continued investment in our transportation infrastructure. We would also like to commend SCAG for its extensive stakeholder outreach, and thank SCAG staff for their cooperation and assistance during the RTP preparation process.

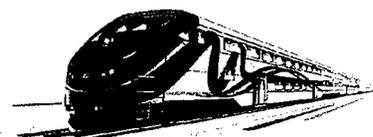
The attached table contains SCRRA's comments on the draft RTP. If you have any questions, please contact Karen Sakoda at (213) 452-0264, or [sakodak@scrra.net](mailto:sakodak@scrra.net).

Sincerely,

  
W. GRAY CRARY  
Chief Strategy Officer  
Southern California Regional Rail Authority

Attachment

Cc: K. Sakoda – SCRRA  
P. Torres-Bruno - SCRRA  
O. Yero – SCRRA

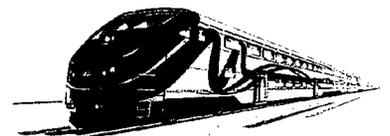


## SCRRA Comments on the Draft 2012 Regional Transportation Plan (RTP)

Document	Page	Comment
RTP	5	We understand that Metrolink's list of constrained projects is included in the \$3.9 billion Transportation Investment cost for Commuter Rail, along with other commuter rail projects submitted by the County Transportation Agencies.
RTP	21	In addition to the four routes mentioned that share portions with the LOSSAN corridor, the Antelope Valley Line shares a segment between Los Angeles Union Station and Burbank Junction. We also recommend removing the reference to the Dodger trains, and replacing the team name with a more general reference to trains for sporting events, and other special events.
RTP	51	Recommend modifying wording that states existing rail service will eventually meet 110 mph. Speeds will vary considerably depending on track configuration and geography, and 110 mph may be attained where safely possible.
RTP	53	Improvements to the LOSSAN Corridor section contains a sentence "...AVL travel time between Palmdale and LAUS can be shortened by 33% simply by skipping less used station stops." Recommend revising AVL express train wording to state, "travel time could be shortened by 25% by skipping selected station stops..."
RTP	73	Goods Movement Rail Strategy - We support expansion of the rail system to accommodate anticipated increases to freight and passenger rail services. Funding capacity expansion, safety improvements and grade separation projects will be crucial to meeting regional goals.
RTP	84	For new projects that result from implementation of the RTP, noise mitigation measures should be addressed through associated project environmental reviews.
RTP	184	Environmental Justice Mitigation Toolbox - Rail Related Impact mitigations pose some challenges. We cannot support the recommendation that rail operators improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise. Also, recommending speed limits and limits on hours of operation to mitigate noise inhibits Metrolink's ability to operate and expand.



<b>Document</b>	<b>Page</b>	<b>Comment</b>
RTP	197	Greater Vision for our Commuter Rail System – Text states that Metrolink operates 164 trips on weekdays. Currently, Metrolink operates 163 trips per weekday. Also, the document states, “With the investments proposed within the Constrained Plan, we expect to achieve more than double the ridership by 2035.” Recommend adding investments proposed in the Strategic Plan which are also necessary to achieve the stated ridership growth.
Passenger Rail	5	Text states that Metrolink operates 164 trips on weekdays. Currently, Metrolink operates 163 trips per weekday.
Passenger Rail	10	Recommend clarifying which “Authority” is being discussed. It is sometimes not clear whether the Authority is the HSR Authority, or SCRRA.
Passenger Rail	20	Recommend adding wording to include investments in the Constrained Plan and the Strategic Plan to achieve a doubling of ridership by 2035.





Orange County  
Council of Governments  
Member Agencies

Aliso Viejo  
Anaheim  
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Cypress  
Dana Point  
Fountain Valley  
Fullerton  
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Huntington Beach  
Irvine  
La Habra  
La Palma  
Laguna Beach  
Laguna Hills  
Laguna Niguel  
Laguna Woods  
Lake Forest  
Los Alamitos  
Mission Viejo  
Newport Beach  
Orange  
Placentia  
Rancho Santa Margarita  
San Clemente  
San Juan Capistrano  
Santa Ana  
Seal Beach  
Stanton  
Tustin  
Villa Park  
Westminster  
Yorba Linda  
County of Orange  
OCTA  
TCA  
OC Sanitation District  
ISDOC  
South Coast AQMD

February 14, 2012

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 Hasan,

On behalf of the Orange County Council of Governments (OCCOG), I would like to commend the Southern California Association of Governments (SCAG) and its staff who worked hard to prepare the draft Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), the Program Environmental Impact Report (PEIR), and associated documents. This effort was monumental and unprecedented in our history and throughout the process collaboration between SCAG and Orange County stakeholders has been exceptional.

The 34 Orange County local jurisdictions and six special districts that comprise OCCOG thank you for the opportunity to comment on the Draft 2012 RTP and associated PEIR.

As you know, Orange County took upon itself the task of developing a subregional SCS. The continued cooperation of SCAG staff and the numerous references throughout the document where the RTP/SCS expressly states that it incorporates the Orange County Sustainable Communities Strategy (OC SCS) into the RTP/SCS document is greatly appreciated.

The OCCOG Technical Advisory Committee (OCCOG TAC), made up of member agency planning staff, created an ad hoc committee dedicated to the review of the Draft RTP/SCS and PEIR. This committee met four times since January 3, 2012, and has collectively spent hundreds of hours since reviewing the draft plan and documents. The OCCOG TAC review and analysis was considered in late January by the OCCOG Board and serves as the basis for OCCOG's comments.

The following general comments and recommendations are offered by OCCOG on the draft 2012-2035 RTP and SCS (draft RTP/SCS) and associated Appendices and draft PEIR (draft PEIR). OCCOG requests that this letter and its attachments be included in the public record as our collective comments on the draft RTP/SCS, PEIR and associated documents.

## 1. GROWTH FORECASTS

**Issue: Growth Projections:** The 2012 growth projections identify population, housing and employment data for the six-county SCAG region, from 2008 (existing) to 2020 and 2035. These growth projections represent the best available information from local jurisdictions, the business community, and landowners. However, as time passes, what is feasible for any given project can change. The triggers for change to adopted growth projections can range from factors such as market conditions, new information or data, infrastructure availability, changes in funding availability (such as the dissolution of redevelopment agencies statewide), and changes to jurisdictional boundaries resulting from future annexations and incorporations of previously designated unincorporated territory. SCAG should continue to adopt the 2012 growth projections at a countywide level, consistent with past approvals of the RTP growth forecasts.

A county level of geography accommodates internal adjustments to changing conditions as described above, without compromising the integrity of the overall growth projections. However, approving the growth projections at any lower level of geography, such as at the city level, would be challenged with continual revisions and shifts to the total number of housing, population and employment within a city, among cities, and between cities and counties as a result of the factors described above. Adoption of the data at a level lower than the county would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the Regional Housing Needs Allocation (RHNA) allocations must be consistent with the RTP/SCS; state law does not require that they be identical. The RTP/SCS can be adopted at the county level and the RHNA process may proceed independently until it is completed after the appeals, trades, and transfers are completed. The RHNA allocations that were derived from the growth forecast can still be determined to be consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.

**Growth Projections Recommendation:** SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, and not at a smaller level of geography such as city, census tract, or traffic analysis level.

**Issue: Orange County Projections (OCP)-2010 Modified:** On January 26, 2012, the update to the OCP-2010 dataset known as "OCP-2010 Modified" was officially approved by the OCCOG Board of Directors and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 Employment Development Department Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this letter also serves as the formal notice of the update that should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.

**OCP-2010 Modified Recommendation:** All documents, tables, maps, narrative, modeling runs, PEIR Alternatives (including Alternate C/3/Envision 2) referencing

the Orange County growth forecasts should be updated with the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors and consistent with the subregional delegation Memorandum of Understanding (MOU) between OCCOG, OCTA and SCAG.

## 2. DRAFT RTP/SCS

**Issue: 2012 Draft RTP/SCS:** The RTP/SCS identifies strategies to reduce greenhouse gas (GHG) emissions from cars and light duty trucks. Because counties, jurisdictions and agencies have different needs and feasibility of implementation, we believe these strategies should be clearly identified as a menu of options that can be used to achieve the goal of reduced GHG emissions. However, the document can be construed to suggest that each of the strategies listed in the table on pages 150-153 are necessary to successfully implement the SCS, many of which are beyond SCAG's purview or control. It is requested that the language be clear that it is permissive.

### 2012 Draft RTP/SCS Requests:

1. **Revise language on page 149: "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which that help can and should undertake in order to successfully implement the SCS."**
2. **Please provide SCAG analysis supporting the strategies in the Draft RTP/SCS Chapter 4.**
3. **Please describe what municipal obligations are anticipated as a result of adopting these strategies as a list to be accomplished rather than a menu of options.**

**Issue: OC SCS Strategies:** There are strategies in the OC SCS that are not included in the regional SCS. Similarly, there are some strategies in the regional SCS that are not consistent with the strategies in the OC SCS. This creates confusion and clarification is needed.

Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional plans that SCAG is then required to incorporate into the regional SCS. In Orange County, the OCCOG and the Orange County Transportation Authority (OCTA) developed a countywide or subregional OC SCS that was to be incorporated in whole into the SCAG SCS. Local agencies in Orange County developed the OC SCS and approved it in June 2011. SCAG has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the regional SCS, but it is unclear what the standing is of the OC SCS. The OC SCS contains a set of strategies that were agreed upon by local governments, agencies and other stakeholders within

Orange County and was accepted by SCAG and should represent the SCS that is applicable to the Orange County region.

**OC SCS Strategies Recommendation:** Please revise the text in the last paragraph on page 106 to state: **“These subregional SCS documents are incorporated into the regional SCS and represent the SCS for each of these subregions.”**

### **3. DRAFT PEIR**

**Issue: Mitigation Monitoring Program Intent:** It is unclear how SCAG intends to implement the Mitigation Monitoring Program with regard to the proposed mitigation measures, as may be implemented by local agencies. Section 1-5 of the PEIR specifically provides that “Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG’s monitoring efforts, including SCAG’s Intergovernmental Review (IGR) process.” It is infeasible for SCAG to require local jurisdictions to report when such mitigation measures are considered for any project. Noting that the SCAG region includes 6 counties, 14 subregional entities and 191 cities, this reporting requirement would surely fall short of expectations. Given this identified infeasibility, please clarify what obligations local agencies may have regarding SCAG’s mitigation monitoring efforts.

#### **Mitigation Monitoring Program Intent Requests/Recommendations:**

- 1. Does SCAG intend to require all jurisdictions that avail themselves of the mitigation measures to report to SCAG when such measures are considered for any project?**
- 2. SCAG’s approval of the PEIR needs to clearly state the intent and applicability of the mitigation measures and the PEIR reflective of our comments below and that mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.**
- 3. Add language to Executive Summary and Introduction: “Mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.”**

### **4. Feasibility and Applicability**

On pages 1-5 and 1-7, the language should reflect that Lead agencies will determine the feasibility and applicability of measures and that the measures are intended to offer a menu of options available should a lead agency opt to utilize them. The PEIR makes the assertion on page 1-7 of the Project Description under Transportation Project Mitigation and Land Use Planning and Development Project Mitigation sections that the draft PEIR has made a preliminary determination that all of the mitigation measures in it are considered feasible. SCAG has not identified any analysis that supports the feasibility of the mitigation measures that are to be undertaken by entities other than

SCAG and SCAG staff has stated on numerous occasions that the mitigation measures were intended to be a menu of options for consideration by lead agencies.

**Issue: Mitigation Measures Impose Obligations Beyond Scope of SB 375.** Given the combination of the RTP and the SCS processes, as mandated by SB 375, we recognize that SCAG must undertake the difficult task of balancing the goal of having a coordinated regional transportation system with land use strategies that encourage a more compact use of land. However, a key principle of SB 375 is that it is not intended to supersede local agencies' authority to regulate land uses. Specifically, Government Code section 65080(b)(2)(K) provides, in relevant part that “. . . Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. . .”

In light of the limitation expressed at Government Code Section 65080(b)(2)(K), we find language in the PEIR, and specifically the mitigation measures therein, imposing affirmative obligations on local agencies within the SCAG region to be inappropriate and contrary to law. The proposed language as recommended below would remedy the legal conflict with Section 65080(b)(2)(K), yet achieve SCAG's recognition that project-specific environmental review is the appropriate level of review for projects that have their own unique, site-specific circumstances.

The revisions are further consistent with OCCOG's understanding that SCAG intended to provide the mitigation measures as a "toolbox" to local agencies for use within their discretion if and when appropriate for projects within their respective jurisdictions. Indeed, from materials presented by SCAG, including the January 26, 2012 workshop held at the City of Anaheim Council Chambers, SCAG explained that **“This PEIR offers a “toolbox” of mitigation measures** for future project-level environmental analyses. . . It also includes suggested mitigation measures for local agencies to consider for implementation, if appropriate and feasible (phrased as “can and should”). This language is permissive and not mandatory upon local agencies.”

**Mitigation Measures Impose Obligations Beyond Scope of SB 375 Recommendations:**

- 1. Please provide SCAG analysis supporting the feasibility of mitigation measures in the PEIR.**
- 2. Change language on page 1-7 found in 2 places under MITIGATION MEASURES, subheadings Transportation Project Mitigation and Land Use Planning and Development Project Mitigation: “This Draft PEIR has made a preliminary determination that the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them where, in the agencies’ independent discretion, the measures are deemed applicable in light specific circumstances at the project level.”**

3. Change language on page 1-5, first paragraph: **“Mitigation Measures proposed in this PEIR are available as tools for implementing agencies and local lead agencies to use as they deem applicable. The implementing agencies and local lead agencies are responsible for ensuring adherence to the mitigation measures as 2012-2035 RTP/SCS projects are considered for approval over time.”**
4. Please make similar text amendments to other sections, including the Executive Summary, of the PEIR that reference how the mitigation measures are to be used by lead agencies.

5. **“Can and Should”**

As indicated in the PEIR on page 1-6, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rests with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures (as discussed in Section 14). OCCOG recognizes that SCAG's use of the words "can and should" are derived from California Environmental Quality Act (CEQA), at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is inappropriate.

**“Can and Should” Recommendations:** Change language in all mitigation measures identifying entities other than SCAG to read **“can and should consider where applicable and feasible.”** To clarify the intent that the mitigation measures are a menu of options for which feasibility has not been established for any given project, the “can and should” language should be changed in all mitigation measures identifying entities other than SCAG to read **“should consider where applicable and feasible.”**

6. **CEQA Streamlining:**

One of the key components of SB 375 was the inclusion of incentives that provided CEQA streamlining for projects consistent with the objectives of the bill as well as consistent with the SCS. As identified on pages 1-10 through 1-12, for projects to qualify for these incentives, mitigation measures from the applicable environmental document must be incorporated into the project. It is not clear, however, which measures would need to be incorporated into a project for it to qualify, particularly in light of the intent of SCAG for the measures to be a toolbox.

**CEQA Streamlining Recommendations:** Please clarify how the “menu of mitigation measures” from this PEIR is expected to be used by a lead agency as well as which ones lead agencies should address in order for a project to qualify the use of the CEQA streamlining provisions of SB375.

## **7. RTP/SCS Policies**

Please ensure that the discussion of the policies represented by the RTP/SCS in the draft PEIR is consistent with the policies actually in the RTP/SCS. In particular, the bullet list on the page 2-3 is stated to represent the land use strategies of the plan; however, the strategies listed are not specifically identified in the regional SCS. Including different language in the PEIR implies additional policy.

**RTP/SCS Policies Recommendation:** Amend the land use strategies identified on page 2-3 of the Project Description, under the section Purpose and Need for Action to reflect the strategies included in the SCS chapter of the RTP.

## **8. PEIR Mitigation Measures**

By far the most concerning portion of the Draft 2012 RTP/SCS to OCCOG members is the PEIR. Specifically, the proposed mitigation measures included in the PEIR extend to and impact a broad spectrum of technical and policy areas. Many examples of these concerns are included on Attachments 1 and 2 of this letter. In sum, the concerns are that the mitigation measures:

- Appear to go above and beyond the requirements of the Regional Transportation Plan and Senate Bill 375;
- Are measures already required by State and Federal law or are regulated by other agencies such as the South Coast Air Quality Management District, California Department of Housing and Community Development, Fish and Game, and the Regional Water Control Boards;
- Appear to run counter to local control; and
- Are financially infeasible for the agencies responsible for implementation.

### **PEIR Mitigation Measures Recommendations.**

1. In order for the mitigation measures to truly be considered a toolbox of options for consideration by various entities in the SCAG region as intended, all mitigation measures in the PEIR intended for entities other than SCAG should be moved into an appendix to the PEIR and renamed “Sustainability Strategies”. These strategies could then be identified for consideration by lead agencies as mitigation for future projects should

a lead agency choose to do so and deem them applicable and feasible. The PEIR would only retain mitigation measures applicable to SCAG. This action would also require that the Executive Summary, Introduction, and Project Description be updated to reflect the nature of the new appendix of Sustainability Strategies.

2. Remove language within mitigation measures that establishes policies not included in the RTP/SCS or modifies the measure to specify a policy or endorses specific technology which would limit agency authority.
3. In the draft PEIR, please replace text in all mitigation measures that identify policy for either SCAG or other entities with language that reflects either adopted SCAG policies or are policies that are included in the RTP and SCS. Mitigation measures should not be used to establish new policy for the region.

For example:

- MM-TR 17: “SCAG shall (for its employees) and local jurisdictions ~~can and~~ should institute where applicable and feasible teleconferencing, telecommute, and/or flexible work hour programs ~~to reduce unnecessary employee transportation~~.
- MM-TR 23: “Local jurisdictions should consider when applicable and feasible coordinated and controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of a feasible, energy efficient Light Emitting Diode (LED) technology.”
- MM-TR 35: “Local jurisdictions should consider where applicable and feasible the adoption of a comprehensive parking policy that ~~discourages private vehicle use and~~ encourages the use of alternative transportation.”

## 9. SCAG Authority

Several mitigation measures identify actions that SCAG shall undertake to mitigate impacts of the plan. Many appropriately direct SCAG to provide a discussion forum or serve as a central data repository for a broad range of topics that affect the region as a whole. However, many measures inappropriately direct SCAG to establish practices, standards, or policy in areas unrelated to what SCAG has purview over. Further, the measures often appear to be directed at policy implementation that is unrelated to the plan itself, such as implementing AB 32. Such measures will essentially require SCAG to establish policy in areas for which it has no authority. Additionally, it is not clear how SCAG would fund the work efforts because they are not directly related to its mission and, therefore, do not have funding. For example, MM-PS 118 states: “SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches and models and to specify levels of performance for regionally

significant projects to be consistent with regional plans.” Green building practices and energy efficiency measures are already addressed by various state and federal agencies, as well as by other local organizations. Further, SCAG does not have the authority to specify levels of performance for land use or buildings.

**SCAG Authority Recommendation: Remove the following mitigation measures for SCAG which it does not have purview for under the law or directed to do by the Regional Council through policy direction. List may not be exhaustive.**

MM-BIO/OS 44	MM-LU 42	MM-LU 77	MM-PS 68
MM-BIO/OS 45	MM-LU 47	MM-LU 80	MM-PS 71
MM-BIO/OS 46	MM-LU 48	MM-LU 81	MM-PS 95
MM-BIO/OS 48	MM-LU 51	MM-LU 82	MM-PS 121
MM-GHG 3	MM-LU 53	MM-LU 83	MM-TR 17
MM-GHG 8	MM-LU 56	MM-NO 12	MM-TR 23
MM-GHG 11	MM-LU 57	MM-NO 16	MM-TR 28
MM-LU 9	MM-LU 60	MM-POP 1	MM-TR 35
MM-LU 21	MM-LU 61	MM-PS 3	MM-TR 83
MM-LU 22	MM-LU 64	MM-PS 14	MM-TR 85
MM-LU 24	MM-LU 65	MM-PS 25	MM-TR 96
MM-LU 26	MM-LU 69	MM-PS 37	MM-W 34
MM-LU 32	MM-LU 71	MM-PS 39	MM-W 59
MM-LU 34	MM-LU 74	MM-PS 41	MM-W 60
MM-LU 41	MM-LU 75	MM-PS 67	MM-W 65

**10. SCAG Mitigation Measures**

It would be helpful to understand how SCAG will implement the mitigation measures that it is assigned to do. Many of the mitigation measures will expand SCAG’s role into areas that are not currently under its purview and are under the jurisdiction of other entities. Many also constitute significant work efforts.

**SCAG Mitigation Measures Request: Please explain how the actions and programs required by the measures SCAG is assigned to do would be funded to ensure that they are truly feasible for SCAG to undertake.**

**11. Ensuring Outcomes**

SCAG has limited authority in many of the areas included in the measures and will not be able to ensure impacts are mitigated and that the outcomes identified do actually occur. SCAG can assist, offer information, educate, and provide discussion forums for topics outside its area of jurisdiction; however, it is not possible to “ensure” that outcomes are achieved for things that are outside of its purview.

**Ensuring Outcomes Recommendation:** Remove all references within mitigation measures that SCAG will “ensure” or “shall minimize impacts” that result from a mitigation measures.

**Example:**

**MM-CUL17:** ~~“Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG’s shall, through cooperation, information sharing and ongoing regional planning efforts such as web-based planning tools for local government including CA lots, and direct technical assistance efforts such as Compass Blueprint’s Toolbox Tuesday series, provide information and assistance to local agencies to help them avoid impacts to cultural resources.~~ Resource agencies, such as the Office of Historic Preservation, shall be consulted during this process.”

## **12. Fees and Taxes**

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation.

### **Fees and Taxes Recommendations:**

- 1. Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. The following list may not be exhaustive.**

MM-BIO/OS55	MM-PS15	MM-TR30	MM-TR88
MM-LU29	MM-PS63	MM-TR37	MM-TR94
MM-LU53	MM-PS75	MM-TR47	MM-TR96
MM-LU54	MM-PS76	MM-TR52	MM-W6
MM-LU80	MM-PS78	MM-TR60	MM-W32
MM-LU81	MM-PS92	MM-TR69	MM-W52
MM-LU82	MM-PS106	MM-TR74	MM-W58
MM-LU83	MM-PS107	MM-TR75	
MM-POP4	MM-PS113	MM-TR80	
MM-PS12	MM-TR28	MM-TR84	

- 2. Please clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.**

### 13. Guidance Documents

Guidance documents are there as information sources for consideration; however, they do not represent regulation or establish standards that are required to be achieved. For example, MM-AQ19 inappropriately indicates that project sponsors should comply with the CARB Air Quality and Land Use Handbook (June 2005) which is only a guidance document.

**Guidance Documents Recommendation: Remove references that indicate a compliance with guidance documents from mitigation measures.**

### 14. Duplicative/Existing Regulations

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the CEQA, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and the regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state, and local laws and regulations.” Similar language is included in some mitigation measures. It is offered that MM-PS 13 is a good example of the type of appropriate language and reads “Project sponsors can and should ensure that projects are consistent with federal, state, and local plans that preserve open space.”

The water section provides another example. The PEIR includes 68 mitigation measures in the Water Resources section regarding water quality. At least 35 of these are related to storm water runoff best management practices (BMPs) that are currently regulated through Municipal National Pollutant Discharge Elimination System (NPDES) Storm Water Permits issued by Regional Water Quality Control Boards. In the SCAG region, there are five water quality control boards each with its own Municipal NPDES Storm Water Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project’s applicable Municipal NPDES Storm Water Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the

mitigation measures regarding specific BMPs should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Storm Water Permit.

**Duplicative/Existing Regulations Recommendations:**

1. **Please remove all mitigation measures listed in Attachment 1 which are duplicative of existing regulations administered by or under the jurisdiction of other agencies. The list may not be exhaustive.**
2. **For each impact, please add the following language: “Local jurisdictions, agencies, and project sponsors should comply, as applicable, with existing federal, state, and local laws and regulations.”**

**15. Draconian Mitigation Measures**

Many of the mitigation measures in the Draft PEIR are draconian and need to be removed. One prime example is MM-LU 85. It reads in part “Local jurisdictions can and should reduce heat gain from pavement and other hardscaping including: Reduce street rights-of-way and pavement widths to World War II widths (typically 22 to 34 feet for local streets and 30 to 35 feet for collector streets curb to curb)...” Although reduced street widths may be appropriate in some cases and have been implemented in many jurisdictions, it is inappropriate and counterproductive to require reduced street widths as a mitigation measure in the PEIR. Reduced street widths, for example, generally do not provide space for on-street parking which may result in greater, additional paved areas provided in separate parking lots. A second example is MM-LU15: “Project sponsors can and 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 transportation projects/improvements.” Measures should support the SCAG Energy and Environment Committee which recommended that the programs build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA’s Measure M Mitigation Program, and Transportation Corridor Agency’s open space mitigation program, which has protected 2,200 acres in perpetuity to date. Open space conservation should be pursued in a voluntary manner, working with willing private sector landowners and not be overly prescriptive and specific.

**Draconian Mitigation Measures Recommendations: Remove mitigation measures that are very prescriptive, such as reducing street widths to WW II widths or specifying preferred technology.**

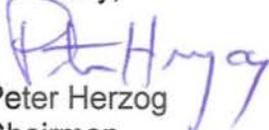
In addition to the above comments, detailed technical comments, language changes, and questions on the RTP/SCS, Appendices, and PEIR documents are included in Attachment 2.

## Conclusion

We recognize the immense efforts it took to prepare these documents. They represent incredibly complex technical work and have important and far-reaching policy impacts for our region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents and hope that preparation of future RTP/SCS documents will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The current timeline of document releases, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because the timeline does not allow for recirculation or full discussion of requested changes. The documents were released over the holiday season and included the release of the draft PEIR document on December 30, 2011. The minimum 45-day public comment period closes on February 14, 2012. Only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 4, 2012.

We appreciate your consideration of all of the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have an RTP/SCS adopted that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me or Dave Simpson, OCCOG's Executive Director.

Sincerely,



Peter Herzog  
Chairman

cc: OCCOG Member Agencies  
OCCOG Board of Directors  
OCTA Board of Directors  
Orange County City Managers Association

**Attachment 1: Mitigation Measures Duplicative of Existing Regulation**  
(Listed by type of regulation measures duplicates)

<b>Air Quality/AQMD</b>	<b>CDFG</b>	<b>Federal &amp; state law</b>	<b>Federal law</b>	<b>Resource agencies</b>
MM-AQ1	MM-BIO/OS1	MM-HM3	MM-LU14	MM-TR33
MM-AQ2	MM-BIO/OS3	MM-HM4	MM-LU30	MM-BIO/OS29
MM-AQ3	MM-BIO/OS4	MM-HM5		MM-BIO/OS30
MM-AQ4	MM-BIO/OS8	MM-HM6		MM-BIO/OS31
MM-AQ5	MM-BIO/OS10	MM-HM7	<b><u>NPDES</u></b>	MM-BIO/OS32
MM-AQ6	MM-BIO/OS11	MM-LU28	MM-AQ16	MM-BIO/OS33
MM-AQ7	MM-BIO/OS17	MM-NO18	MM-BIO/OS19	MM-BIO/OS34
MM-AQ8	MM-BIO/OS18	MM-PS13	MM-GEO5	MM-BIO/OS35
MM-AQ9	MM-BIO/OS21	MM-W36	MM-W1	MM-BIO/OS50
MM-AQ10	MM-BIO/OS22	MM-W37	MM-W13	MM-BIO/OS51
MM-AQ11	MM-BIO/OS23	MM-W38	MM-W58	
MM-AQ12	MM-BIO/OS24			
MM-AQ13	MM-BIO/OS25		<b><u>Flood control</u></b>	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		<b><u>Local Agencies</u></b>	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
<b><u>State law</u></b>				
MM-AV3	MM-HM10	MM-PS4	MM-PS107	MM-W25
MM-AV6	MM-HM11	MM-PS8	MM-PS113	MM-W26
MM-AV12	MM-HM12	MM-PS10	MM-PS119	MM-W27
MM-BIO/OS20	MM-HM13	MM-PS12	MM-PS122	MM-W28
MM-CUL1	MM-HM14	MM-PS14	MM-TR29	MM-W29
MM-CUL2	MM-HM15	MM-PS16	MM-TR49	MM-W30
MM-CUL3	MM-HM16	MM-PS35	MM-TR55	MM-W31
MM-CUL4	MM-LU10	MM-PS36	MM-TR75	MM-W32
MM-CUL5	MM-LU11	MM-PS37	MM-TR89	MM-W39
MM-CUL6	MM-LU17	MM-PS42	MM-W6	MM-W43
MM-CUL7	MM-LU19	MM-PS43	MM-W8	MM-W46
MM-CUL8	MM-LU20	MM-PS48	MM-W9	MM-W47
MM-CUL9	MM-LU38	MM-PS55	MM-W10	MM-W48
MM-CUL10	MM-LU43	MM-PS56	MM-W11	MM-W49
MM-CUL11	MM-LU44	MM-PS57	MM-W12	MM-W50

MM-CUL12	MM-LU48	MM-PS59	MM-W15	MM-W51
MM-CUL13	MM-LU58	MM-PS61	MM-W16	MM-W52
MM-CUL15	MM-NO1	MM-PS67	MM-W17	MM-W54
MM-CUL16	MM-NO4	MM-PS69	MM-W18	MM-W55
MM-GEO1	MM-NO8	MM-PS71	MM-W19	MM-W56
MM-GEO2	MM-NO9	MM-PS73	MM-W20	MM-W61
MM-GEO3	MM-POP2	MM-PS77	MM-W21	MM-W62
MM-GEO4	MM-POP4	MM-PS89	MM-W22	MM-W64
MM-GEO6	MM-PS1	MM-PS92	MM-W23	MM-W66
MM-HM9	MM-PS2	MM-PS97	MM-W24	MM-W68

Attachment 2: Additional Technical Clarifications on documents are also offered as follows:

**2012 RTP/SCS**

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	all	<i>All chapter headings should include the Chapter number on each page for ease of reference.</i>
2	Clarification	1, left column	"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to <u>comply with SB 375</u> , <del>both</del> improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. As
3	Clarification	4, right column	"This region needs a long-term, sustainable funding plan that <u>ensures the region receives its fair share of funding</u> , supports an efficient and effective transportation system that grows the economy, provides mobility choices, and improves our quality of life."
4	Clarification	page 7- Table 2 and page 95- Table 3.3	<i>Is additional \$0.15 gas tax the sum total of both state and federal taxes or \$0.15 each?</i>
5	Clarification	40, left column	"Strategic investments, <u>put forth by the private sector</u> , that would remove barriers associated with telecommuting are expected..."
6	Correction	page 42- Table 2.2	241 toll road completion year is <u>2030</u>
7	Please define in the text and add to a glossary	50, left column	"scrip"
8	Clarification	54, right column	"Express/HO T Lane Network Despite our concerted effort to reduce traffic congestion through years of infrastructure investment, the region's system demands continue to exceed available capacity <u>during peak periods</u> ."
9	Clarification	70, 78	Greenhouse Gases and Air Quality SCAG seems to rely on CEQA to achieve the "maximum feasible" reductions in emissions from transportation. However, this is not consistent with the intent of SB 375's goal of achieving specific thresholds of 8% by 2020 and 13% by 2035 through a sustainable communities strategy plan.

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
			<p><i>Please provide clarification to this section indicating if the air quality and greenhouse gas CEQA mitigation measures obligate regional agencies and project developers to undertake more strategies, programs and mandates beyond those included in the OC SCS.</i></p>
10	Clarification	78, right column	<p>“Greenhouse Gases On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total. <u>Emissions from passenger vehicles, which are the subject of SB 375 and this RTP/SCS, constitute % of the transportation sector’s greenhouse gas emissions total.</u>”</p>
11	Clarification	80, left column	<p>Statements are made, such as the following, "the RTP has the ability to affect the distribution of that growth" (in population in the region). These statements could be interpreted to be contrary to SCAG's obligation under the Memorandum of Understanding with OCCOG to respect the strategies and local land use policies in the OC SCS.</p> <p><i>Please clarify how it is in SCAG's ability to affect local change when the OC SCS is consistent with acceptance of local land use plans and planned population and employment distribution?</i></p> <p><i>Recommended text change:</i> “Transportation projects including new and expanded infrastructure are necessary to improve travel time and can enhance quality of life for those traveling throughout the region. However, these projects also have the potential to <u>induce</u> attract more of the regional population growth in certain areas of the region. <u>This means that although</u> <del>Although</del> SCAG does not anticipate that the RTP would affect the total growth in population in the region, the RTP has the ability to affect the distribution of that growth.”</p> <p><del>“In addition to induced population growth,</del> transportation projects in the RTP also have the potential to divide established communities, primarily through acquisition of rights-of-way.”</p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
		82, right column	<p>Text indicates that the RTP and projects in the RTP/SCS as “inducing” growth. It is noted that use of the term “induced growth” has a negative connotation and implies growth above and beyond what would occur naturally. However, it is stated in the RTP that the population, housing, and employment growth totals are fixed and only the distributions may change based on the plan. This means there will not be “new” growth and that the RTP and SCS may simply influence and shift the growth anticipated for the region. This moving of growth is the result of changes in distribution that are due to changes in land use or densities. Because of this, it is requested that references to “induced growth” be reworded to reflect the shifting of growth in the region.</p> <p><i>Recommended text change:</i> “Cumulative impacts from the projected growth <del>induced by the RTP</del> include increased impervious surfaces;...”</p>
12	Clarification	Chapter 3	<p>SCAG’s Financial Plan includes a significant portion of “New Revenue Sources and Innovative Financing Strategies” that are not currently in place or available. While some of the proposed revenues are within the control of SCAG or MPOs and County Transportation Commissions, the majority of the revenues (in terms of dollars) require either state or federal action to implement.</p> <p><i>Please explain what the implications are if these new revenue sources and innovative financing strategies do not become available?</i></p>
13	Clarification	page 95- Table 3.3	<p><del>“Mileage-based user fees would be implemented to replace gas tax and augment estimated at about \$0.05 (2011\$) per mile and indexed to maintain purchasing power starting 2025.”</del></p> <p>Suggested language is from page 31 of Growth Forecast Appendix:  <u>“Current gasoline tax, estimated at about \$0.05 (2011\$) per mile will increase through 2025, then in 2026 it would be replaced with a mileage-based user fee indexed to maintain purchasing power.”</u></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
14	Clarification	105, right column	“While the region was once known worldwide as the “capital of sprawl,” the region today <u>is projecting growth on only a small fraction of the <del>has little</del> raw land available in the region left to accommodate additional growth.</u> ”
15	Clarification	105, right column	“While the region was once known worldwide as the “capital of sprawl,” the region today <u>is projecting growth on only a small fraction of the <del>has little</del> raw land available in the region left to accommodate additional growth.</u> ”
16	Clarification	106	SCAG indicates that the OC SCS has been incorporated into the regional SCS. OCCOG was one of two subregions that undertook the arduous task and obligation of preparing an SCS.  <i>Please add clarifying text that these subregional SCSs, including the OC SCS, represent the Sustainable Communities Strategies applicable to those subregions.</i>
17	Clarification	110, right column	“Municipal water and sewer systems, for example, ensure clean water. At the same time, <u><del>concrete stormwater runoff channels harm water quality and sprawl eats into open space</del> as areas become more urbanized and the percentage of impervious surface is increased, the hydrologic regime is dramatically altered. Drainage conveyances that once were natural and riparian are required to be engineered as hardened flood control channels to provide adequate protection of private property and public infrastructure from the increased frequency, duration, peak flow, and overall volume of stormwater runoff. With this armoring of once natural channels, water quality benefits from biofiltration are lost along with opportunities for infiltration and evapotranspiration, which can lead to hydromodification downstream in sections which are not yet engineered and hardened. Many strategies...</u> ”
18	Clarification	112, 117	The SCS documents the development of four scenarios to explore basic aspects of future growth. These scenarios were used in public outreach and the SCS and the associated Appendix states that “Using the public dialogue and feedback from the analysis of the SCS Scenarios, SCAG developed

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
			<p>the 2012 RTP/SCS Plan alternatives.” (Similar references are also include at RTP/SCS p. 117, and SCS Background Documentation p. 71). The RTP/SCS and Appendix then describes a process that led to the Plan alternatives. Neither the RTP/SCS, Appendix or PEIR expressly state or illustrate the fundamental land use and socioeconomic foundation for the SCS.</p> <p><i>In order to confirm consistency with the OC SCS, it is requested that SCAG include appropriate tables, graphics and maps that provide the detail that confirm this consistency.</i></p>
19	Clarification	113, 122	<p>The regional SCS states that the scenarios/alternatives were developed using the Local Sustainability Planning Tool (LSPT). The LSPT is a sketch planning tool that flattens geographical areas to a 5-acre grid cell. The OC SCS land use data was provided at much greater level of detail in that specific parcel data and detail were provided by each jurisdiction. A cursory review of some LSPT data reveals inconsistencies regarding interpretation of Orange County land uses.</p> <p>It is acknowledged that the regional SCS states, "Land use inputs for OCCOG SCS were unchanged". Yet use of the LSPT and SCAG Development and Community Types presented in the SCS leave open the question as to whether the OC SCS was altered, as noted above.</p> <p><i>Please provide confirmation that the underlying OC SCS land use data was used without significant alteration and LSPT flattening and interpretation in the development of the regional SCS Plan and alternatives.</i></p>
20 17	Add to glossary	127, right column	“Gentrification”
21	Clarification	128, left column	<p>“Thus, this adjustment allowed the land use pattern to conform more closely to local <u>expectations general plans</u>, while reducing the amount of vehicle miles traveled.”</p> <p><i>Whose/What are “local expectations?”</i></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
22	Clarification	149, right column	<p><i>Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.</i></p> <p><i>“The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders <u>may use or consider while preparing specific projects which would help can and should undertake in order</u> to successfully implement the SCS.”</i></p>
23	Clarification	150-152	<p>The OC SCS was accepted by SCAG and represents the set of strategies and the growth distribution that outlines the best approach for how the requirements of SB 375 would be met within the subregion. Specifically, the OC SCS included 15 specific Sustainability Strategies, reflecting a menu of 222 practices and actions that OC agencies have agreed to pursue (or continue to pursue) to achieve GHG reductions that support SB 375.</p> <p><i>Why doesn't the regional SCS specifically acknowledge these 15 strategies yet include other strategies and performance measures not included in the OC SCS (e.g., Locational Efficiency)?</i></p>
24	Add to glossary	166, right column	“Greenfield”
25	Clarification	194, right column	“In addition to these targeted outreach efforts, all regular and special meetings of the RTP task forces, the Transportation Committee (TC), <u>the CEHD, the EEC,</u> and the SCAG Regional Council are publicly noticed and ...”
26	Clarification	201	<i>Please clarify whether the text stating “Long-term emission reduction for rail, with a goal of zero-emissions rail system” is intended to reflect a zero-emissions freight rail system, or whether this goal also applies to passenger rail.</i>
27	Clarification	202, 203- Table 7.1	<p>Unfunded operational improvements, of which several are listed on page 203, Table 7.1, include transit station improvements in Irvine, Fullerton, and Santa Ana, bus rapid transit (BRT) in Orange County, and high speed rail (HSR) Phase II.</p> <p><i>Please confirm that these are consistent with the OC SCS.</i></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION	COMMENT &
28	Clarification	207	Strategic Finance	
				<i>Please explain what will happen if reasonably foreseeable revenue sources of approximately \$200 million do not become available?</i>
29	Add to glossary	205	"Active transportation"	

### **GROWTH FORECAST APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Updated growth forecast numbers	23, Table 13	In December 2011, Orange County provided SCAG with the revised growth forecast dataset, OCP-2010 Modified, per the OC SCS MOU (official OCCOG Board action 1/26/2012).
			<i>Please incorporate revised Orange County numbers (i.e. OCP-2010 Modified) into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.</i>

### **PERFORMANCE MEASURES APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	1	The document states, "The performance measures are used to evaluate how well the RTP/SCS addresses the adopted goals and performance outcomes."
			<i>Is there any formal role for the performance measures?</i>
			ARB will evaluate for SB 375 compliance not based on these measures but based on ARB process.
			<i>Please include language clarifying that this is a requirement to demonstrate compliance with federal requirements and not for the obligations under SB 375.</i>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	Clarification	1, end of first paragraph	Add statement: <u>“Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.”</u>
3	Clarification	1, column 2	The document states, “The Regional Council will formally adopt the goals and outcomes as part of the final 2012 RTP/SCS.”  <i>Does this bring any formal obligation to meet goals? Goals are general, flexible, and aspirational rather than specific, as on p.1.</i>
4	Clarification	13, Table 8	The RTP/SCS claims an extra 2% CO <sub>2</sub> e emissions reduction in 2035 from the NHTS post-processing analysis. While the RTP/SCS meets the ARB SB375 goal without the extra 2%, we would like to note that the extra 2% could be important if the attorney general raises concerns about backsliding. Consequently, the reliability of the extra 2% reduction should be checked. Questions on the NHTS model are below.  It would be useful to know the answers to better judge the quality, although we do note that the report does look like it meets the standards or best practice.
5	Clarification	9	NHTS Model Documentation Report  <i>Are the auto and bus accessibility variables included in the regression models for 30-mile rings?</i>  <i>In “Number of trips” model – is number of cars, included as an independent variable, the actual or predicted value?</i>  <i>The same question applies to other models.</i>
6	Clarification	23, Table 10	NHTS Model Documentation Report  <i>Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample?</i>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Clarification	24, Test 3	<p>NHTS Model Documentation Report</p> <p>(Compare Trip-Based and NHTS Model): The final test was to compare the results of the Trip-Based Model and the NHTS Model for the same scenarios.</p> <p><i>Please describe the scenarios tested.</i></p>

#### **TRANSPORTATION FINANCE APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	General	<p><i>What are the implications if revenues other than core revenues do not become available?</i></p> <p><i>Please describe any implications to the ability of the region to meet SB 375 GHG emission reduction targets or the federally required air quality conformity?</i></p>

#### **SCS BACKGROUND DOCUMENTATION APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Please define	53, right column	<p>Housing Options and Mix:</p> <p>Define Larger-lot single family in text</p>
2	Clarification	71-74, 80-83	<p>Alternatives naming: A, B, C</p> <p>Names of Alternatives differ than those listed in the PEIR on pages ES-3 and 1-4.</p> <p><i>Please be consistent with naming protocol for alternatives between two/all documents.</i></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
3	Revise language to clarify	71, right column	“Plan Alternative (B) ... The alternative maintains city-level forecast control totals for both households and jobs, however, within city boundaries shifts are made to focus a much larger share of future growth in a more compact way around HQTAs, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u> Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family <del>housing</del> housing.”
4	Please define	71, right column	Plan Alternative (B)  Define small lot single family in text
5	Revise language to clarify	71, right column	Plan Alternative (C) “As a result very suburban communities may experience no new <u>housing or employment</u> growth, while some urban areas with very good access to regional transit may experience significant increases in <u>housing or employment</u> growth.”
6	Revise language to clarify	72, left column	“While each alternative is distinctive, a number of parameters remained constant across each alternative: the regional RTP/SCS forecast total for <u>population, households and jobs;</u> ...”  “Detailed forecast: the detailed distribution of <u>population, households, and jobs</u> across the region...”
7	Revise language to clarify	72, Table D1	Alternatives A & B: “Controlled to TAZ-based RTP/SCS Forecast for 2020; Controlled to city-level RTP/SCS Forecast for 2020-2035, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u> ”  Add statement to table notes: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u>
8	Revise language to clarify	74, Table D2	Alternatives A & B: Add statement: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
9	Clarification	75, right column	<p>“Development Types The alternatives are built on, and provides data at, the level of the TAZ, which includes housing units and employment.”</p> <p><i>Please clarify if TAZ is Tier 1, Tier 2, or both.</i></p>
10	Revise language to clarify	79, right column	<p>“Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected <u>unchanged</u> and integrated into the alternatives (with possible revisions for Alternative C only).”</p>
11	Clarification	79	<p>The section includes the following language: “Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected and integrated into the alternatives (with possible revisions for Alternative C only).”</p> <p><i>Please clearly indicate what the “possible revisions” are and what process would be used to coordinate with Orange County should changes to the socioeconomic data contained in the OC SCS be proposed?</i></p>
12	Revise language to clarify	80	<p>Alternative A Add statement: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
13	Revise language to clarify	81	<p>Alternative B</p> <p>It is not clear whether Alternative B is the SCS land use plan. If it is, statements in the appendix lead one to believe the OC SCS foundation has been altered. For example, adjustments made to land uses to locate proximate to High Quality Transportation Areas (HQTA) and intensification of residential and employment development in HQTA that diverge from local General Plans as well as implementation of a vehicle user fee are not part of the OC SCS.</p> <p><i>Is Alternative B the SCS land use plan?</i></p> <p><u>Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u></p>
14	Clarification	115, left column	<p>Transit Zoning Code Santa Ana 2011</p> <p><i>Is this a duplicate of the 2010 Santa Ana project?</i></p>

**PEIR**

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	Revise language to clarify	ES-2	<p>ES contains matrix of mitigation measures which reference project sponsors, local agency, and project implementation agency without definitions. Add definitions into ES at end of ES.1:</p> <p><u>In general, the terms “local agency,” “project sponsor” and “project implementing agency” are used throughout this PEIR to identify agencies, organizations, companies and individuals that will act as lead agencies or project applicants for different types of individual projects. Individual projects that are anticipated to occur pursuant to the 2012-2035 RTP/SCS consist of planning projects (general plans, specific plans, climate action plans, etc.), development projects (including Transit Priority Projects (TPPs) and other similar projects), and transportation projects.</u></p> <p><u>In general, “local agency” is used to refer to a public agency that would propose a planning project or a public infrastructure project and/or an agency that would be lead agency for individual projects. “Project sponsor” is typically used to refer to an applicant (that could be public or private, an organization or an individual) that proposes a project. “Project implementing agency” is used to refer to an agency responsible for implementing a project. In this document, project-implementing agencies are those that are responsible for carrying out (reviewing, approving, constructing) transportation projects.</u></p>
2	Clarification	ES-3, 1-4, Chapter 4	<p>Alternatives’ Naming: No Project Alternative, Modified 2008 RTP Alternative, Envision 2 Alternative; Alternatives 1, 2, 3</p> <p>Names of Alternatives differ than those listed in the SCS Background Documentation appendix on pages 71-74 and 80-83.</p> <p><i>Please be consistent with naming protocol for alternatives between all documents.</i></p>

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
3	Fix numbering	ES-31	Duplicate naming of GHG11 and GHG12
4	Please define	ES-42	LU63- What are the smart growth principles?
5	Please define	ES-42	LU64- What are the benchmarks for smart growth?
6	Fix numbering	ES-51	PS17 & PS18 are missing
7	Fix numbering	ES-53	Duplicate naming of PS36 & PS37
8	Please define	ES-67	TR 34- what are the identified transportation benchmarks?
9	Please define	ES-83, 3.13-42 MM-W43	Define climate change hydrology
10	Please define	ES-40, 3.8-21 MM-LU42	Define urban growth boundary
11	Please define	ES-57, 3.11-49 MM-PS68 & ES-74, 3.12-43 MM-TR96	Define parking cash out program/ cashouts
12	Clarification	1-5	<i>Besides IGR, what other monitoring efforts is SCAG in charge of? (that would require lead agencies to provide SCAG with documentation of compliance with mitigation measures)</i>
13	Language correction	1-6, paragraph 3	Language correction: "The latter <b>former</b> finding..."
14	Language correction	2-5	Sustainability section should be separated.  Language correction: <b>Sustainability.</b> The 2012-2035 RTP/SCS is subject to specific requirements for environmental performance.  <b><u>New paragraph:</u></b> "Beyond simply meeting these requirements, a ..."
15	Language correction	2-5, Table 2-2	"Align the plan investments and policies with <b>while</b> improving..."
16	Please define	2-14	Define "scrip"

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
17	Narrative	2-21	<p>AB 32 is global warming solutions act. SB 375 was determined to be stand-alone legislation. RTP document is not forum to address global climate change and references distract from RTP goal and purpose. “Global warming” and “global climate change” are not interchangeable phrases. References should be removed or, where appropriate, language should be changed to “global warming”.</p> <p><del>Goods movement is also a major source of GHG emissions that contribute to global climate change.</del></p>
18	Clarification	2-27 paragraph 4	<p>Not in SCAG’s authority, nor funding available. Delete sentence:  <del>SCAG will work with local jurisdictions and community stakeholders to seek resources and provide assistance to address any possible gentrification effects of new development on existing communities and vulnerable populations.</del></p>
19	Clarification	2-27 paragraph 5	<p>“The 2012-2035 RTP/SCS land use development pattern accommodates over 50 percent of new housing and employment growth in HQTAs, while keeping jurisdictional totals consistent with local input.”</p> <p><i>Please confirm that there are no changes to the local land use inputs provided by Orange County.</i></p>

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	2-29	<p>“For purposes of SCAG’s SCS, a Development Type reflects an estimated average density of 22 residential units per acre. However, it is important to note that the designation is a potential ultimate average for the TAZ—and is not an absolute project-specific requirement that must be met in order to determine consistency with the SCS. In other words, the SCS was not developed with the intent that each project to be located within any given TAZ must exactly equal the density and relative use designations that are indicated by the SCS Development Type in order for the project to be found consistent with the SCS’s use designation, density, building intensity and applicable policies. Instead, any given project, having satisfied all of the statutory requirements of either a residential/mixed-use project or TPP, may be deemed by the lead agency to be consistent with the SCS so long as the project does not prevent achieving the estimated average use designations, densities and building intensities indicated by the Development Type within the TAZ, assuming that the TAZ will be built-out under reasonable local planning and zoning assumptions.”</p> <p><i>Does the above PEIR language create a requirement for average TAZ density levels in 2035 and a requirement that each local project not preclude those density levels?</i></p> <p><i>Additionally, please clarify whether in HQTAs, these densities could be exceeded as well as implications of an area that is already fully developed not redeveloping such that it ever achieves the identified densities.</i></p>
21	Please define	3.8-5 paragraph 3,	Define “open space”

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
22	Revise language to clarify	4-39	<p>Envision 2 alternative contains growth projections that would place housing in flight paths, locate housing on sites for which housing is not allowed due to environmental contamination, would significantly impact existing industrial operations necessary to maintain quality jobs in the region, and does not include development projects that are legally allowed due to having existing entitlement for development. Because this alternative does not consider the existing health and safety of future residents nor the existing legal approvals of development in the region, it is not possible to determine if the alternative is actually superior to other alternatives. It is simply another alternative for consideration.</p> <p><i>Please remove references to the Envision 2 (or any other name of this alternative) as being environmentally superior.</i></p> <p><del>ENVIRONMENTALLY SUPERIOR</del> <u>ENVISION 2</u> ALTERNATIVE</p>
23	Revise language to clarify	4-40	<p>“Of the three alternatives, the Envision 2 Alternative would be considered <u>by State CEQA guidelines</u> as the environmentally superior alternative because it does not allow further use of land for single-family development...”</p>



# Los Angeles County Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

February 14, 2012

Hasan Ikhata  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Dear Mr. Ikhata:

We want to commend you and your staff for the years of hard work in preparing the Draft 2012 RTP/SCS for the region. As we are undergoing a General Plan Update for the unincorporated areas of Los Angeles County, it is an exciting time to be coordinating our local land use planning efforts with SCAG's regional efforts to meet our State climate change goals.

The Department of Regional Planning has worked with your staff to provide the County's local input for the growth forecast for the unincorporated areas of Los Angeles County. The County's recommendations have been largely based on policies from the existing General Plan, knowledge of the unincorporated areas, alternative projections prepared by the County's Urban Research section, and proposed policies in the General Plan Update.

We are concerned that the Draft RTP/SCS states that the growth forecast is based on local input. The Overall Land Use Pattern Maps for Los Angeles County (Part A of the SCS Background Documentation appendix of the Sustainable Communities Strategy Chapter) reflect land use patterns that are not part of the County's local input. In particular, the land use pattern for the northwest corner of the unincorporated Antelope Valley reflects significant growth by 2020. A review of the TAZ-level socioeconomic data for that area shows projections of over 10,000 new households by 2020, and over 22,000 new households by 2035. The area is a greenfield designated Non-Urban by the Antelope Valley Area Plan. The area also consists of environmental and hazard constraints. Another concern is the land use pattern in unincorporated Rowland Heights and unincorporated South Diamond Bar along SR-57, particularly the designation of this area as a High Quality Transportation Area by 2035. This area is vacant, designated Open Space or low density, and also consists of hazard and environmental constraints.

It is our understanding that SCAG assumed growth within these areas based on knowledge of pending large-scale projects through the CEQA Intergovernmental Review (IGR) process. The assumption of growth based on pending individual projects is not explicitly described in the Draft RTP/SCS as part of SCAG's growth forecast

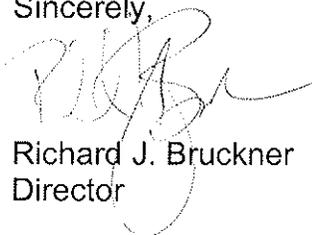
methodology. In addition, assuming growth based on individual and pending projects is of concern given the uncertainty of projects that have not been considered by a decision-making body and the public, and the significant time and complex issues entailed in processing large-scale projects. The projects mentioned above will require legislative acts by the Los Angeles County Board of Supervisors and this action should not be assumed. In addition, assuming a pending project in the growth forecast puts local governments in a difficult position and causes confusion when the project is actually considered for public hearing. Furthermore, as large-scale projects are often built in phases, assuming full build-out for an individual project within the horizon of the RTP may not always be appropriate—in particular, assuming over 10,000 new households by 2020 and over 22,000 new households by 2035 in one particular TAZ. These projections are not consistent with historical data. The Antelope Valley absorbs less than 200 new units per year. Even if 100% of the growth were in this one area, these projections would far exceed historic patterns.

Given the outlined concerns, we recommend the following amendments to the Draft 2012 RTP/SCS:

- Amend the Overall Land Use Pattern maps and adjust the associated TAZ-level socioeconomic data to redistribute the growth assumed to occur due to pending large-scale IGR projects to areas where the County encourages growth in the General Plan Update, such as Transit Oriented Districts; and
- As an alternative to using pending large-scale IGR projects to inform growth distributions in the Draft RTP/SCS, add a separate section to the Draft RTP/SCS that acknowledges pending large-scale IGR projects throughout the SCAG region and their potential to impact future growth forecasts upon approval and adoption by the local jurisdiction.

Consistency between the General Plan Update and Draft RTP/SCS is an important part of advancing the goals of the RTP/SCS at the local level. We acknowledge that several large projects are in the entitlement process, and at the time projects are approved it would be appropriate to amend the RTP/SCS. We look forward to continuing to work with you to realize our shared vision to create a socially, economically, and environmentally sustainable region.

Sincerely,



Richard J. Bruckner  
Director

RJB:cc

C: Board of Supervisors Planning Deputies

# WILDLIFE CORRIDOR CONSERVATION AUTHORITY

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CITY OF DIAMOND BAR

**HOWARD VIPPERMAN**  
CITY OF LA HABRA HEIGHTS

February 10, 2012

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

## **Comments on 2012-2035 Draft Regional Transportation Plan and Sustainable Communities Strategy and Draft Program Environmental Impact Report (SCH# 2011051018)**

Dear Mr. Lieb:

The Wildlife Corridor Conservation Authority (WCCA) provides the following comments on 2012-2035 Draft Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and Draft Program Environmental Impact Report (PEIR; SCH# 2011051018). WCCA was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains.

### **Environmental Mitigation Program**

We are pleased to see the inclusion of an advanced mitigation component in the RTP/SCS. This concept has seen great success in Orange County's Renewed Measure M and in fact, is viewed as a model for comprehensively mitigating transportation project impacts with meaningful acquisition and restoration projects. Last year alone, the Orange County Environmental Mitigation Program acquired nearly 950 acres of important natural lands and has funded five restoration projects. Advanced mitigation has many benefits including: streamlined permitting, preservation of important natural lands, improved relationships and collaboration with resource and permitting agencies, to name a few.

We do, however have several suggestions for modification of the Conservation Policy including:

1. Ensuring State conservancies and joint powers authorities with a conservation focus are included in the mapping and prioritization of conservation lands. Specifically, we recommend including WCCA, Puente Hills Habitat Preservation Authority, San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy, Mountains Recreation and Conservation Authority (MRCA), and

Santa Monica Mountains Conservancy (SMMC) among the entities upon whose expertise can be tapped.

2. Extending the inventory of protected lands to include all protected lands – Federal, State, regional and local natural lands – instead of narrowly limiting the inventory to simply Natural Communities Conservation Plan and Habitat Conservation Plan areas.
3. Ensuring existing wildlife corridors and habitat linkages and highway/roadway undercrossings are protected and enhanced during the evaluation of habitat lands and during construction of roadway projects.
4. Advocating that the advanced mitigation policy result in a net environmental benefit for the natural resource lands after construction activities are completed.

Also, large-scale acquisition and management of lands must not be limited to "critical habitat," (RTP, p. 76, 128) as this can be confused with the legal term used by U.S. Fish and Wildlife Service for some federally endangered and threatened species. To clarify, this should be replaced by text reflecting the intent, i.e., the best available natural lands with valuable environmental resources deserving of conservation/preservation.

WCCA looks forward to working with Southern California Association of Governments (SCAG) on the development of the Natural Lands Acquisition and Open Space Conservation Strategy. This will protect remaining resource lands and mitigate for impacts from transportation improvements. In addition to mitigation banking, transfer of development rights (TDR), and payment of in-lieu fees, WCCA recognizes conservation easements as a powerful preservation tool for habitat areas. Conservation easements, and fee title transfers to open space park agencies, should be listed in the plan alongside the other preservation mechanisms.

Transfer of development rights is a potentially useful market-based preservation mechanism that supports regional density goals. SCAG should take a leadership role in setting guidelines and best practices for these new county and municipal programs as well as explore the creation of a regionally unified TDR program. This method should not only be limited to agricultural lands, but also include other open space lands.

### **Avoidance of Growth in Resource Areas**

The RTP/SCS generally steers growth toward more compact forms in already urbanized areas, making efficient use of existing infrastructure and reducing impacts to resource lands. The policy decisions contained within the SCS are projected to save 408 square miles of nonurban land over the life of the plan. If realized, these gains are certainly an

achievement, although there is no projection of where this growth will not occur and what mechanisms will preserve the land in perpetuity.

The lack of specificity makes it difficult for WCCA to evaluate the impacts of the proposed plan. While the projections are intended to be a meta-analysis of regional economic trends rather than a location-specific analysis of growth patterns, SCAG is clearly making assumptions about where development on resource lands is and is not appropriate. This process is not transparent.

For example, the large undeveloped privately-owned property known as the Aera property in the middle of the Puente Chino Hills wildlife corridor<sup>1</sup>, has been identified on Exhibit 4.1 as population growth of 2,001-3,500 persons per square mile. In fact, much of this property has been identified as a proposed Significant Ecological Area in Los Angeles County's most recent draft General Plan.

Ironically, this particular development proposal's population, employment and housing growth areas contradict the goals of Senate Bill (SB) 375 and its requirement for reduced vehicle miles traveled (VMT). The location of the development is nowhere near public transit, does not include a major employment center but instead focuses on large single family residential units, requires dependency on the automobile, and will increase VMTs, not reduce them.

With the understanding that land use authority belongs to local jurisdictions, a truly comprehensive regional plan would transparently set growth parameters in concert with resource conservation goals to eliminate these apparent contradictions. Projecting growth in resource areas sets in motion policies that induce that growth; therefore great care must be taken to ensure such growth meets regional objectives.

### **Wildlife Crossings of Transportation Facilities**

WCCA appreciates SCAG's recognition of the impact that linear transportation facilities have on natural areas and the need for well-designed wildlife crossings to partially mitigate these effects. Wildlife crossings serve two distinct purposes: reducing mortality and preserving genetic connectivity. Roads are the leading direct source of human-caused mortality for most species in southern California and the entire country. They can become a population sink if a significant fraction of a local species is killed, affecting broader population distribution across the landscape. Additionally, for highly mobile predators,

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<sup>1</sup>The 2,925-acre Aera property is located in the middle of the Puente Chino Hills wildlife corridor, primarily west of State Route [SR] 57 in Los Angeles County, but also occurring east of SR-57, and also in Orange County.

individuals crossing roads are frequently dispersing from their home range in search of new territory and mates, a vital population dynamic that is devastating if interrupted. National Park Service research has documented significant genetic differences among carnivore populations on either side of the 101 Freeway in the Santa Monica Mountains.

Wildlife crossings need to be discussed in the context of habitat connectivity, which is the broader ecological goal for conservation areas. Wildlife crossings are but one critical tool to ensure that indicator species are able to safely move about their environment. While much has been learned about movement patterns and the way in which key transportation facilities create genetic barriers to connectivity, the measures that might mitigate these impacts have not been thoroughly researched. Wildlife corridor design is a field in its infancy with few scientifically verified best practices for crossing dimensions and landscape features. Given that this research is needed to properly mitigate transportation impacts, SCAG should invest in connectivity research with a program specifically designed to establish measures that can be incorporated into the 2016 RTP revision. Such a program would aggregate existing research, propose new study areas, and develop design best practices specifically tailored to the Southern California eco-region.

### **River Parkways and Active Transportation**

WCCA is interested in urban river projects for their multiple recreational, environmental, and transportation benefits. The RTP/SCS should fully fund build-out of these active transportation corridors throughout the region. When well designed, these facilities serve as "bicycle freeways" connecting various parts of the region with uninterrupted travel for nonmotorized users. Separated from traffic, such facilities are also inviting for bicyclists of all ages and abilities, which is necessary to attract substantial mode share away from automobiles.

The RTP/SCS calls for \$6 billion over the next two decades for active transportation investments, which seems low when compared to the identified need in local bike and pedestrian plans. Given the central role active transportation plays in meeting regional planning objectives, funding levels should be set based on full build-out of local bicycle and pedestrian plans, with an appropriate amount projected for those jurisdictions that have not yet completed such plans. The currently proposed funding level does not appear to be rooted in such a need-based assessment. It is not adequate to simply compare the proposed expenditures with past levels independent of a needs assessment.

In addition to the total funding level, the proposed timing of active transportation investment is inadequate. Only 20 percent of the proposed expenditures would occur during the first 15 years of the 25-year planning period, leaving the vast majority of expenditures for the highly speculative future and of little use to current residents. Transit and transportation demand management are similarly back-loaded with only highway-related investments

receiving funding priority in the near term. These non-highway investments are the ones most likely to generate greenhouse gas emissions savings, among other benefits, and the earlier they are made the longer the benefits can accumulate. The proposed expenditure plan runs directly counter to the stated emphasis of the SCS.

Active transportation projects, including the river parkways, are suffering for lack of funding. The most visionary plans require extensive funding to come to fruition and provide their multiple benefits. Planning is well underway, but capital dollars are in short supply for these projects. Furthermore, achieving greenhouse gas reduction and air quality goals requires early mode shift to maximize cumulative benefits over the life of the plan. WCCA suggests that the plan's funding priorities be reversed to immediately fund active transportation investments at a sufficient level to achieve build-out of the region's bicycle and pedestrian networks in the near and medium term. Such a change would make the RTP more consistent with the land use and mode share objectives outlined by the SCS, the intent of SB 375.

For example, WCCA encourages SCAG to evaluate the feasibility and to develop a greenway corridor that can be used for active transportation (e.g., bicycle trail) along San Jose Creek, connecting to the San Gabriel River (by Whittier Narrows) and further west. This San Jose Creek bikeway is an east-west route that parallels the State Route 60 freeway. It is an important commuter route, where a viable bikeway could relieve some freeway traffic. Maintaining and enhancing an open creek channel for wildlife use (e.g., birds) and recreational use (bicycles) would be a valuable amenity in this area. It would be beneficial to investigate and implement other bicycle routes in the area, including a connection between the LARIO trail along the Rio Hondo from its end at Peck Road Water Conservation Park to the San Gabriel River. Another valuable connection would be between the Whittier Greenway Trail to the San Gabriel River at its west end and from its east end to Coyote Creek. These trails are pieces in the larger planned bikeway trail network throughout the region.

## **Comments on Proposed PEIR Mitigation Measures**

### *Biological Resources and Open Space*

The PEIR includes many mitigation measures for potential impacts to biological resources. Overall, these measures are comprehensive and based on sound practice. Inclusion of the proposed mitigation measures in project selection and design will greatly improve ecological outcomes in the SCAG region compared to a baseline scenario. The specific measures calling for minimum mitigation ratios reflect current accepted practices without limiting the discretion of resource agencies to require greater mitigation if warranted.

The proposed measures addressing habitat fragmentation and connectivity are thorough and appropriate (MM-BIO/OS36 through MM-BIO/OS40). These impacts have been all too often unmitigated for transportation projects in the past.

WCCA looks forward to collaboration on regional conservation planning policy to address cumulative impacts to biological resources (MM-BIO/OS45). MRCA is one agency in the SCAG region that administers a highly successful restoration and preservation in-lieu-fee mitigation program in close coordination with State and Federal resource agencies. SCAG's planning and funding expertise is a welcome addition to ongoing efforts. WCCA recommends that other agencies with expertise in the region, such as MRCA, SMMC, Puente Hills Habitat Preservation Authority, and WCCA be invited to participate in this process.

The primary impact from transportation facilities is often the indirect and cumulative impact from growth induced by new improvements. As projects increase access and reduce commute times from remote areas, these resource lands become economical to develop. The Conservancy is therefore pleased to see SCAG recognize these impacts and call for their mitigation (MM-BIO/OS47). Without appropriate growth management along transportation corridors, wildlife crossings cannot mitigate connectivity impacts from expanding development footprints. Furthermore, induced growth along new corridors often negates the benefits of new transportation capacity, prompting even greater impacts from future facility expansion. SCAG should develop best practices that would be applicable to new transportation corridors to prevent new development from extending into resource lands.

The PEIR biology mitigation measures should be clarified to delete reference to relocating active nests (MM-BIO/OS35), as this is likely in conflict with the Migratory Bird Treaty Act. Instead, construction buffers to active nests should be established, as proposed.

#### *Land Use and Agriculture Resources*

As stated previously, WCCA is encouraged to see transfer of development rights (TDR) programs included in the RTP/SCS (MM-LU16). Los Angeles County is including a TDR program in its general plan update. SCAG should provide technical assistance and facilitate interjurisdictional transfer programs among member governments as appropriate.

WCCA is pleased to see strategic planning that encourages recreational access to natural lands be coupled with efficient land use strategies to preserve these lands (MM-LU25 and 26). Location-efficient and compact development is better for the economy and environment by reducing infrastructure costs, increasing tax revenues per acre, and reducing consumption of agricultural land and habitat.

Urban growth and service boundaries are a critical tool local jurisdictions have to protect resource areas within greenbelts (MM-LU42). WCCA strongly supports efforts by local jurisdictions to establish such policies. SCAG should promote best practices in greenbelt planning and facilitate interjurisdictional collaboration to protect resource areas that separate discrete urban communities. WCCA notes that effective policies restrict densities to no more than one dwelling unit per ten acres outside of urban growth boundaries. Densities above this threshold begin to affect resource values, particularly habitat connectivity and sensitive species. One unit per ten acres is an appropriate maximum density to reduce the proliferation of "ranchette" developments that highly fragment habitat in rural areas.

WCCA supports local jurisdictions using variable development fees as an economic incentive to direct growth to desired areas. In particular, increasing impact fees for development in greenfield areas would recognize the resource impacts of such developments while rewarding new developments that minimize the burden on public infrastructure by locating in existing urban areas (MM-LU81). Such fees would need to be considerable to actually have an effect on land economics at the regional scale. SCAG should undertake an economic analysis to determine what level of fees would be required to achieve regional growth objectives.

#### *Public Services and Utilities*

The PEIR lacks a public safety mitigation measure that promotes project design that minimizes urban-wildland interface, which is the source of wildfire risk to persons and property. Past development patterns include long, meandering urban edges with high risk exposure to catastrophic events, causing great strain on local and State firefighting resources largely subsidized by those living in lower risk locations. A mitigation measure should include two components addressing both project location and project design. First, development that extends into high fire hazard areas should be discouraged. Second, there should be an emphasis on utilizing project design strategies to reduce risk, such as building within compact and defensible footprints and minimizing perimeter length. Projects should be sited in order to reduce impacts of required brush clearance on native habitat areas, including adequate buffers to protect sensitive resources from brush clearance impacts. The draft Los Angeles County Significant Ecological Area Ordinance contains model language to this effect.

WCCA concurs that project sponsors and local jurisdictions should work to increase public access to open space (MM-PS21 and 26). River parkways and other urban natural parks serve a vital purpose in connecting urban residents to natural parkland (MM-PS22). The City of Los Angeles and County of Los Angeles have both recognized these projects in master plans for their respective river corridors. While planning for these projects is the

responsibility of local jurisdictions and partners, SCAG has a critical responsibility for funding by including bikeway projects in the RTP area.

Regional partnerships are necessary to achieve open space conservation objectives (MM-PS29). As previously mentioned, WCCA welcomes SCAG's assistance with planning and identifying funding sources for open space acquisition (MM-PS31 and 34). SCAG's participation in coordinating regionally significant trail networks is also appreciated, however the greatest contribution SCAG could make to these efforts would be including those greenways that serve transportation functions, such as the river parkways, in the RTP so that they can be fully developed in the short and medium-term (MM-PS33).

#### *Transportation*

WCCA looks forward to SCAG support and urges that ample funding be provided for full build-out of the river parkway systems, combining transportation and recreation functions to improve the quality of life for southern California residents. These parkways often connect with schools, parks, libraries, and other community facilities (MM-TR43). Such connections should be enhanced through regular transportation improvements and the development of regional and local networks of multi-use trails with adequate end-of-trip facilities (MM-TR78).

#### *Water Resources*

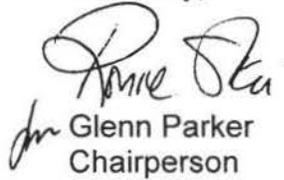
WCCA believes that preservation of remaining riparian resources should be the highest priority at both the regional and project level, followed by restoration of previously impacted areas (MM-W1 and 9). To the extent feasible, natural methods for stormwater control, water quality improvements, and infiltration should be encouraged.

SCAG sets an appropriate standard that new projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters (MM-W22). When evaluating projects during the environmental review process, SCAG should identify regionally significant projects that may impact downstream waters and include comments to that effect in Notice of Preparation and Environmental Impact Report responses. This is a critical issue wherever natural rivers interact with urban areas. SCAG should participate in the development of models of natural processes for the remaining natural rivers in the SCAG region to ensure that environmental review can comprehensively evaluate project impacts based on the best available information.

Jacob Lieb, SCAG  
2012-2035 Draft RTP/SCS and Draft PEIR  
February 10, 2012  
Page 9

We appreciate your consideration of these comments. Please continue to maintain our agency on your email/ mailing lists for this project. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at [judi.tamasi@mrca.ca.gov](mailto:judi.tamasi@mrca.ca.gov).

Sincerely,



Glenn Parker  
Chairperson



**Richard I. Mueller**  
President

**Ameron International Corporation**  
**Water Transmission Group**  
10681 Foothill Blvd., Suite 450  
Rancho Cucamonga, CA 91730  
Telephone: 909/944-4100. Ext. 192  
Fax: 909/980-7865  
Email: [Richard.Mueller@nov.com](mailto:Richard.Mueller@nov.com)

February 5, 2012

Mr. David Alba  
GRID Logistics, Inc.

Via email: [davidalba1@gmail.com](mailto:davidalba1@gmail.com)

Subject: Constructability of Proposed GRID "SuperDock" and Freight Pipeline

Dear Mr. Alba:

I have been involved in the design, manufacture, installation, operation and maintenance of pipelines made of steel, concrete, and fiberglass, and of diameters from 10" to 252" in diameter. I have been involved in the development of pipelines systems for transfer of solid freight for more than two decades. I was also involved in the design and installation of rail siding and rail loading systems for rail delivery of the wind towers which Ameron International Corporation fabricates at our plant in Fontana, California.

I have discussed the GRID proposal with many of my engineer colleagues, both regarding basic constructability and particularly in regard to maintaining system reliability while crossing southern California's seismic faults even in the event of substantial differential ground movement. Based upon my background and evaluation, and that of the pipe and rail experts with whom I have discussed the GRID project, it is our determination that the GRID freight pipeline is buildable using current technologies.

Ameron International Corporation is now a wholly owned subsidiary of National Oilwell Varco, (NOV). NOV also owns AmClyde, a designer and manufacturer of the most demanding crane systems, including those used for stevedoring. AmClyde engineers have reviewed the proposed design concept for the GRID "SuperDock" and agree it can be designed and built to function as intended for the GRID system.

These engineers and I look forward to building this project for the benefit of southern California and for the reduction of transportation costs for and environmental impact from all freight moved through the ports at San Pedro Bay.

Sincerely,

**Ameron International Corporation**  
**Water Transmission Group**

A handwritten signature in black ink, appearing to read "Richard I. Mueller".

Richard I. Mueller, P.E.  
President

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**SAN MANUEL**  
BAND OF  **MISSION INDIANS**

**Date:** *via Fax (213) 236-9689*  
February 14, 2012

02-15-12 A08:28 RCVD

**To:** **Margaret Lin**  
**Southern California Association of Governments – SCAG**

**From:** **Jerry J. Paresa, Chief Administrative Officer**  
**San Manuel Band of Mission Indians**  
**26569 Community Center Drive, Highland, California 92346**  
**(909) 864-8933**

**Attached:** **Comments to Draft SCAG 2012-2035 Regional Transportation Plan**  
**Sustainable Communities Plan and Preliminary Environmental**  
**Impact Report**

**Pages:** **Cover + 3**

————— *San Manuel Band of Mission Indians* —————

February 14, 2012

Mr. Jacob Lieb  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: San Manuel Band of Mission Indians – Comments to Draft SCAG 2012-2035 Regional Transportation Plan Sustainable Communities Plan and associated Preliminary Environmental Impact Report

Dear Mr. Lieb:

The San Manuel of Band of Mission Indians ("Tribe"), a federally recognized Tribe, wishes to express its appreciation to the Southern California Association of Governments (SCAG) and Mr. Arnold San Miguel for the February 8, 2012 briefing on the Draft SCAG 2012-2035 Regional Transportation Plan Sustainable Communities Plan (RTP/SCP) and associated Preliminary Environmental Impact Report (PEIR). The Tribe appreciates the opportunity to comment on SCAG's Regional Transportation Plan as San Manuel actively participates in and supports community and regional economic and social initiatives. The Tribe supports long range planning that employs a sustainable-community approach to transportation projects and in land use, open space and preservation of biological and cultural resources. As a Serrano people whose ancestors inhabited a large area of San Bernardino County, the Tribe maintains a close spiritual relationship to many important cultural places in the landscape and feels a keen stewardship for the protection and preservation of these places. It is with this obligation in mind that the Tribe actively engages in consultation and preservation efforts for cultural resources throughout San Bernardino and other Southern California counties.

The Tribe believes that it is essential that SCAG and other regional agencies establish a meaningful and timely consultation process with the Tribe in accordance with the unique legal relationship existing between the United States and Indian Tribal governments set forth in the Constitution of the United States, treaties, statutes, Executive Orders and court decisions and the trust relationship of the United States and Indian tribes. The Tribe looks forward to working with SCAG in order to implement this consultation.

The Tribe's experience has shown that regular and meaningful consultation, including a meaningful and timely process for seeking, discussing and considering carefully the views of others and seeking agreement when possible in a manner that is cognizant of the cultural values and legal rights of all parties is most effective. Moreover, whenever appropriate, the use of "certified Native American monitors" (persons who are certified by a recognized institution to

monitor archaeological resources with specific knowledge in local ancestral California Native American village sites and cultural practices), may prevent costly delays and offer unique opportunities to contribute to all parties' efforts to preserve and promote an important part of cultural history.

The Tribe offers the following comments and language to the 2012-2035 RTP/SCS Draft PEIR 3.4-22 Mitigation Measures, which strengthen the processes for protection of cultural resources:

MM-CUL5. Language added as follows: ...NAHC to determine whether known sacred sites are in the project area and identify the Native American(s) and *Native American tribes (added)* to contact to obtain information about the project site. Add: *It is strongly recommended that federal and state lead agencies and cities and counties require that a check of the NAHC sacred lands files be undertaken in all projects and that the Native American tribes or individuals identified by the NAHC(GI1AM2) be contacted by project proponent for further information and consultation on the project.*

MM-CUL6. Add: *It is strongly recommended that state and federal lead agencies and cities and counties require that a qualified archaeologist conduct a record search at the appropriate Information Center in all projects.*

MM-CUL7. Add: *It is strongly recommended that state and federal agencies and cities and counties conduct a phase I archaeological or historic architectural survey for all projects that have not been previously surveyed or have been surveyed within the last 10 years.*

MM-CUL-8. Add: *It is strongly recommended that state and federal lead agencies and cities and counties require that a certified Native American monitor be employed by the project proponent or tribe to monitor the subsurface operations or any earth movement in all projects. It is also strongly recommended that a pre-excavation agreement be implemented with culturally affiliated tribes.*

MM-CUL9. Add: *Avoidance is the preferred alternative. If avoidance is not feasible, it is strongly recommended that state and federal lead agencies and cities and counties require that the project sponsors consult with culturally affiliated Native American Tribes in the determination of importance of the resource.*

MM-CUL10. Add: *It is strongly recommended that state and federal lead agencies and cities and counties require that the project sponsors consult with culturally affiliated Native American Tribes in the determination of importance of the resource.*

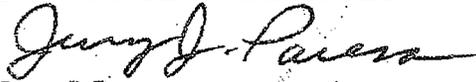
MM-CUL17: Add: *SCAG shall engage in government-to-government consultation with Indian tribes in development of the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, per the laws set out in 3.4.-1 – 3.4-5, California Senate Bill 18 (Government Code 65300 et seq) and in accord with the unique legal relationship existing between the United States and Indian Tribal governments set forth in the Constitution of the United States, treaties,*

*statutes, Executive Orders and court decisions and the trust relationship of the United States and Indian tribes.*

The Tribe appreciates your consideration of the proposed policy language as presented above as well as the opportunity to continue the government-to-government dialogue. Please do not hesitate to contact me if you have any questions.

Very truly yours,

SAN MANUEL BAND OF MISSION INDIANS



Jerry J. Paresa  
Chief Administrative Officer

JP:AM:cjt



## REGIONAL PLANNING

- Page 7 Table 2: **New Revenue Sources and Innovative Financing Strategies** – The region's budget over the next 25 years totals an estimated \$524.7 billion. We encourage SCAG to continue close collaboration and consensus-building with Federal, State and Local partners as these strategies and funding sources are pursued.
- Page 27 **Integrating Land Use and Transportation** – The RTP/SCS states that SCAG has incorporated the sub-regional SCS strategies of OCCOG and GCCOG into the regional SCS. It would be helpful if the RTP explained exactly how those strategies were incorporated. .
- Page 30 **Public Health** – The RTP/SCS recognizes the impact that transportation and land-use decisions have on the health of the region's residents. SCAG should be commended for including studies and a discussion on this topic in the RTP/SCS which identifies a 200% overall investment increase over the 2008 RTP.
- Pages 33-34 **Alternatives Development and Evaluation** – The chosen alternative should be clearly identified in the RTP, with supporting information explaining the rationale for its selection.
- Pages 112-116 **Creation of Land Use Scenarios** – Chapter 4 explains and describes the four land use scenarios that were developed and presented at the regional public workshops for inclusion in the RTP/SCS however it is not clear how the preferred alternative was chosen.

## SYSTEM PLANNING/GOODS MOVEMENT

- Page 23 - **Aviation and Ground Access** - the second paragraph alludes to air cargo by stating that "Southern California airports play a crucial role in international trade..," but the text does not elaborate. If the regional roadway system becomes increasingly congested please describe the impacts to air cargo ground access or capacity, being that the last mile is typically transported by truck.
- Page 65 - **International Trade** - recommend changing the sentence to read, "In the same year, \$10.4 billion worth of trade passed through the Calexico East International Port of Entry (POE) between the U.S. and Mexico in Imperial County." Note: of the three land POE's in the county, only Calexico East handles commercial traffic.
- Page 65 - **Local Goods Movement** - Dependent Industry Support - recommend adding agriculture as one of the supported industry sectors. Agricultural production in the SCAG region is significant, amounting to nearly \$7 billion in 2010.  
<http://www.cfbf.com/counties/index.cfm>
- Page 66 - **Land Ports** - recommend changing the sentence to read, "The Calexico East International POE in Imperial County is the sixth busiest commercial crossing along the U.S./Mexico border, with over 600,000 annual commercial vehicle crossings in 2010, and a

combined import/export value of over \$10 billion. The primary economic drivers of cross border trade to Imperial County are the movement of agricultural products and the maquiladora trade industry."

- Pages 71 and 72. **Regional Clean Freight Corridor System.** The discussion indicates that a dedicated truck-only freight corridor could serve as a "platform for the introduction and adoption of zero-emission technologies;" however, the connections between the East-West Freight Corridor and clean trucks could be stronger, and the introduction of clean trucks could be related to the timeframe in Table 2.8 (page 72).

### TRANSIT

- Trip Planners: Please consider incorporating future updates of transit route data in trip planning tools such as *Google Transit* or *Go511.com*.
- Page 3 - the following sentence needs to be corrected: "Currently, SCRRA operates seven routes including five from downtown Los Angeles to Ventura, Lancaster, San Bernardino, Riverside, Orange and Oceanside, from San Bernardino to Oceanside, and from Riverside via Fullerton or City of Industry to downtown Los Angeles." The word in this sentence "five" should read "six" instead. One route is missing in the list. Please add "Orange" after Riverside.
- Page 31- Connectivity measures need to include a high degree of reliability (on-time performance to meet connections with other modes).
- The transit supplemental report should include how gas prices affect the fares and ridership. Gas price is a major operating expense in bus operations. It should also include such variables as inflation rate, CPI, unemployment rate, to see how they are related to fares and ridership.

### SUSTAINABLE COMMUNITY STRATEGY (SCS)

- It should be noted that Caltrans has not done an analysis of the transportation travel model work utilized with the SCS. We would expect the California Air Resources Board to make any comments on that topic: <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>
- In order to see the Greenhouse Gas (GHG) emission reduction compliance table for the SCAG RTP/SCS, the reader has to find it on page 3.6-20 of the PEIR. This data table should be included in the SCS Section of the RTP as well as in the PEIR.
- Caltrans supports SCAG's RTP/SCS mitigation measures aiming at reducing VMT and the associated GHG emissions, encouraging sustainable land use development, and the development and implementation of the use of multi-modal transportation options.
- As the owner and operator of the State Highway System (SHS) the Department's main objective is to

protect the mobility and operational safety of the SHS. To ensure operational safety and consistency with the Department's policies, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that may have an impact on state facilities.

- To encourage collaboration among all stakeholders we recommend the following comment to be incorporated in the policies of the Transportation, Traffic, and Security Mitigation Measures:

Local jurisdictions and development project proponents should and are encouraged to coordinate and consult early with the Caltrans District Planning offices of Local Development Intergovernmental Review on any land use proposal that would be located within 500 feet of state transportation facilities to enable consideration of the site specific access and operational safety impacts.

### **PROJECT LIST**

- On the Project List for Orange County there is no mention of extending the planned High Occupancy Vehicle (HOV) lane from Avenida Pico to the Orange/San Diego County Line in both directions.
- Project List for Los Angeles County - on page 157 the Route High Occupancy Vehicle (HOV) project, Citrus to Route 57/210, it should be noted that the portion of Route 210 between Route 10 and Route 210 has been re-named Route 57. This was done to address confusion between Interstate 210 west of Route 57 and State Route 210 east of Route 57. New signage has been recently added.
- Also on the Project List for Los Angeles County - please delete the following project on page 161: Route 405 in Inglewood at Arbor Vitae which is pertaining to constructing the south half of the interchange. The Interstate 405 Arbor Vitae Half Interchange Project in Inglewood has been shelved per FHWA due to a required design exception issue.

### **HIGHWAYS AND ARTERIALS**

- Page 15 - Caltrans encourages SCAG to coordinate with Caltrans Districts and regional partners to ensure consistency with interregional system development and operational strategies. Examples could include project phasing and integration, the development of HOV/HOT /Managed Lane policies, and the alignment of on-system transit service support strategies.
- Page 3 - under OR SR-71 should read SR-73 and where it says SB SR-210 should be I-210.

### **GENERAL COMMENTS**

SB 391 and the California Interregional Blueprint should be mentioned among related initiatives.

## **COMMENTS ON THE DRAFT PEIR**

- Page 3.2-5 – "USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the six priority MSATs: benzene, formaldehyde, acetaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, and 1,3-butadiene." We recommend mentioning Naphthalene and Polycyclic Organic Matter (POM), and updating the text to reflect the additional air toxins. Furthermore, state that until the Air Resource Board develops the speciation factors for Naphthalene and POM, an analysis cannot be performed.
- (Pg) 3.2-10 -TABLE 3.2-1: **STATE AND NATIONAL AMBIENT AIR QUALITY STANDARDS** - Vinyl Chloride for the state standard (24 hour) has been changed from 0.03 ppm (42 ug/m<sup>3</sup>) to 0.01 ppm (26 ug/m<sup>3</sup>). We recommend using the table published by the California Air Resources Board (CARB) located at:  
<http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>

Caltrans commends SCAG for considering some of the health risks associated with the RTP. The Health Risk Assessment in Appendix J only analyzed emissions, cancer risk impacts associated with Air Quality, and was only focused on several corridors in the region. Caltrans recommends that Health Risk/Impacts should first be addressed at the policy level and analyze the potential health risks associated with Air Quality, Noise, Hazardous Waste and Community Impacts for the complete RTP, considering all the projects included in the plan.

In an effort to be more efficient and minimize confusion in the future, Caltrans requests that SCAG only forward the PEIR to the following two locations:

California Department of Transportation  
Division of Planning - Office of Community Planning  
Local Development - Intergovernmental Review  
P.O. Box 942874, M.S. 32  
Sacramento, CA 94274-0001  
Attention: Terri Pencovic, Statewide Program Manager

California Department of Transportation  
District 7 - Office of Regional Planning IGR/CEQA Branch  
100 S. Main Street, M.S. 16  
Los Angeles, CA 90012  
Attention: DiAnna Watson, IGR/CEQA Branch Chief

District 7 will be responsible for circulating the PEIR document and coordinating comments on behalf of the California Department of Transportation.

Mr. Hasan Ikhata  
February 14, 2012  
Page 6

If you should have any questions in regard to the above comments, please do not hesitate to contact Melissa Joshi of my staff at (213) 897-1347.

Sincerely,

A handwritten signature in black ink that reads "James J. McCarthy". The signature is written in a cursive style with a large, sweeping initial "J" and a long, trailing flourish at the end.

JAMES J. McCARTHY  
Deputy District Director  
Division of Planning, Public Transportation and  
Local Assistance

Mr. Hasan Ikhata  
February 14, 2012  
Page 7

cc: William A. Mosby, D8  
Bill Figge, D11  
Pat Landrum, D11  
Ryan Chamberlain, D12  
Ron Kosinski, D7  
Garth Hopkins, ORIP  
Dara Wheeler, ORIP  
Kathleen McClafin, DMT



**REGENT PROPERTIES**

**JEFFREY A. DINKIN**

February 14, 2012

Margaret Lin  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: Comments on Draft 2012-2035 Draft RTP/SCS

Dear Ms. Lin:

Thank you for the opportunity to comment on SCAG's Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy ("Draft RTP/SCS" or "SCS"). We understand that this is an enormous undertaking and appreciate SCAG's efforts in this process. We look forward to playing a constructive role in the further development of the SCS.

As explained below, we are concerned that the draft RTP/SCS as proposed would result in an inappropriate use of the regional growth forecast planning effort to encroach on local land use authority and jurisdiction. We therefore request that SCAG (1) extend the comment period and make transportation analysis zone (TAZ) data available for public review and comment; (2) correct the TAZ data and maps to accurately reflect current local planning decisions including entitled projects; and (3) revise the SCS so that consistency determinations are made not at the small-scale level of a TAZ, but at the jurisdictional level to allow reasonable flexibility and appropriate land use decision making authority at the local level.

**1. The SCS does not appear to account for projects already in process**

Regent Properties owns over 1,000 acres of land in Southern California and controls an additional 2,500 acres of land in Southern California and has a long history of quality developments in the SCAG region. However, we are concerned that the SCS process has not fully accounted for projects that are already in process. Regent has several projects in the area that are fully entitled and approved for build-out, as well as proposed projects with pending applications that represent a substantial investment of resources to design, plan and communicate with the community and responsible agencies. While the SCS itself states that it was created with input from local jurisdictions (see, for example, Draft RTP/SCS p. 111), we are concerned that the growth projections contained in the SCS and Land Use Pattern Maps do not in fact reflect the land use decisions that have been made by local jurisdictions. More specifically, while the Draft RTP/SCS indicates that it has shifted projected densities from less developed areas to the urbanized core, nowhere does the SCS clearly state that those shifts in density take into account development projects that are either already approved or that are reasonably foreseeable projects which local jurisdictions have already spent considerable resources processing.

## **2. Underlying TAZ data must be released to allow meaningful public comment**

Moreover, the SCS's treatment of approved projects is impossible to determine from the information that SCAG has made available to the public. The 2035 Land Use Pattern Maps, which are intended to depict projected density and land use, are at such a large scale, with such slight color gradations, that they cannot be interpreted in any meaningful way. The SCS itself does not seem to contemplate that these maps will be important to future transportation and land use decisions. Instead, the SCS focuses on the projected density contained in the data that underlies the maps -- data that SCAG has not released to the public. The SCS states that the land use projections contained in the SCS are based on the distribution of growth forecast data to transportation analysis zones. (RTP/SCS, p. 122.) According to the SCS, the TAZ data contains forecasted housing, population, and employment data, which the SCS used to create "Community Types" and more refined "Development Types" that contain average use designations, densities, and building intensities. The SCS states that a Development Type, including an average residential density, has been assigned to each TAZ for purposes of creating the SCS. (Draft RTP/SCS, p. 123.) However, it cannot be determined whether this assignment was made in a manner that takes existing conditions (including approved and reasonably foreseeable projects) as a baseline for these projections, nor can it be determined how the forecasting was done or how it was distributed across the TAZ.

Despite the critical role of the TAZ data in developing the SCS, we are not aware that SCAG has made this data available for public review and comment in any meaningful way. We were able to obtain partial data, showing housing densities only, from other agencies involved in the SCS process. These data do not contain employment or population forecasts, and do not contain any Community Type or Development Type designations which, according to the SCS, have been assigned to each TAZ. It is not possible for the public to provide meaningful comment on the SCS without access to the underlying data on which density and land use projections are based. In the absence of the underlying data and modeling supporting the proposed plan, we are substantially impaired in our ability to provide meaningful public comment on the technical and legal adequacy of the plan. In particular, we cannot assess whether the underlying data adequately reflects all developments as approved. Under the federal (5 U.S.C. § 500 *et. seq.*) and California Administrative Procedures Acts (Gov. Code §§11340 *et seq.*, including § 11346.2(b)(6)), the opportunity for public comment must include disclosure of the data and technical studies in time to provide meaningful public comment. *See, e.g. Solite Corp. v. EPA*, 952 F.2d 473, 484 (D.C.Cir.1991) (*per curiam*).

While we are not confident that the data is either accurate or complete, we have reviewed what data we were able to obtain. Based on our review we conclude that the forecasted housing densities do need to be corrected, as the numbers clearly do not reflect either existing entitlements or pending, reasonably foreseeable projects.

## **3. Implications of consistency with underlying TAZ data**

The importance of the TAZ data is not limited to understanding how the SCS was created. In addition to being the basis for creation of the SCS land use projections, according to the SCS, the TAZ data is to be relied on in future determinations as to whether a project is consistent with the SCS. The SCS states:

"SCAG suggests that utilizing community types at the TAZ level of geography (which an average size of 160 square acres) offers local jurisdictions adequate information and flexibility to make appropriate consistency findings for projects to be eligible to receive CEQA streamlining benefits." (Draft RTP/SCS p. 122.)

"One way of determining consistency [with the SCS] is if a proposed residential/mixed use or TPP [Transit Priority Project] conforms with the Development Type designated for a TAZ." (Draft RTP/SCS, page 148.)

Despite these explicit statements that the existing TAZ data will be critically important to future decisions affecting projects, SCAG has not provided the public the opportunity to review and comment on the TAZ data in any meaningful way.

Significantly, a project's consistency with the SCS -- which is to be determined at the TAZ level according to the SCS -- affects not only the availability of CEQA streamlining incentives, but can have adverse consequences for the availability of federal funds for transit improvements that would serve the project. Transit improvement projects relying on federal funding must be consistent with an approved RTP, and with the adoption of SB 375, that includes consistency with the Sustainable Communities Strategy portion of the RTP as well. (40 CFR 93.102; 42 U.S.C. 7506.) Thus, if the Draft RTP/SCS has shifted density away from approved or pending projects, those projects stand to lose critical transit improvements. The loss of transit improvements could impair project feasibility, or create new unmitigated impacts if traffic mitigations become unfunded, which could result in an unlawful taking of private vested property rights for those projects that have already been approved by local jurisdictions. In many cases, approved projects also involve executed development agreements, which means that violation of contractual rights could also result, causing difficult situations for developers and local jurisdictions.

We are concerned that a project's inconsistency with the growth projections contained in the SCS may have broader implications as well. Local jurisdictions will be under considerable pressure to conform their general plans to the density, intensity, and land uses contained in the SCS, or risk losing transportation funding throughout their jurisdictions. While all the implications of a project's inconsistency with the SCS have yet to be determined, we are concerned that by shifting density away from locally approved and pending projects, the SCS is creating land use policy in violation of SB 375's mandate that the SCS must not supersede the land use authority of cities and counties. (Gov't Code 65080(b)(2)(J).)

**4. RTP/SCS consistency should be determined at the jurisdictional level.**

The TAZ maps are a modeling tool for engaging in a regional planning and evaluation process. The feasibility of achieving the precise results in any particular TAZ area has not been evaluated or confirmed by any city council or board of supervisors, and as explained above it appears that the TAZ data and maps for 2035 do deviate from general plans and vested entitlements that have been approved by these elected officials. While we understand elected bodies or senior administrative staffs of local jurisdictions may have approved local input for the overall population and household numbers within their respective jurisdictions, we believe they have not approved the TAZ data or maps. Accordingly, requiring consistency determinations

concerning use designations, density, and building intensity at the small scale of each TAZ would be inappropriate and overly-prescriptive.

Again, SB 375 specifically precludes SCAG from interfering with local land use decisions.<sup>1</sup> SB 375 requires that an SCS “identify the *general* location of uses, residential densities, and building intensities *within the region*....” Calif. Government Code § 65080(b)(2)(B)(i) (emphasis added). Thus there is no legislative mandate that SCAG identify the location of land uses, densities and building intensities within the region more precisely down to a TAZ level. Instead, SCAG should appropriately identify these characteristics at a level consistent with the need for reasonable flexibility and local control. At the lowest, the level of comparison should be at a jurisdictional level – particularly given that there are nearly 200 jurisdictions within the SCAG region. Accordingly, we urge SCAG to identify such characteristics at no finer a scale than at the lesser of (i) the jurisdiction, and (ii) the sub-region (i.e., where unincorporated county land is divided into sub-regions).

Despite SB 375's mandate that the SCS not regulate land use, the draft RTP/SCS "shifts" households "from the periphery into the urbanized core" stating that much of this shift "will occur naturally in the marketplace," and that this "shift" was done "per consultation with the local jurisdictions." (Draft RTP/SCS p. 128.) However, this shift does not "occur naturally," nor through a "consultation" process between agency staff that excludes the public. Instead, such a shift can only occur, if at all, as part of a separate and lengthy discretionary development application process involving requests to local land use jurisdictions to amend their general plans, specific plans, areas plans, and zoning. In short, there is no "shift" to high-density housing in some local jurisdictions, and away from housing density already approved by other jurisdictions, unless and until the local land use jurisdictions adopt the requested discretionary approvals.

#### 4. Conclusion

The draft RTP/SCS represents a substantial and important regional planning effort. We believe the current draft needs to be corrected to reflect current local land use planning decisions,

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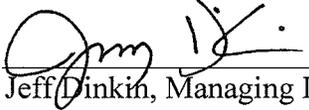
<sup>1</sup> SB 375 provides in pertinent part:

- "Neither a sustainable communities strategy nor an alternative planning strategy regulates the use of land . . . "
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and to ensure that the regional growth projection process is not implemented in a manner that infringes on either vested property rights or the land use authority of local jurisdictions. We appreciate SCAG's consideration of the comments provided in this letter and look forward to your responses. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Regent Properties, LLC  
a Delaware limited liability company

By:   
Jeff Dinkin, Managing Director

cc: Supervisor Jeff Stone, Riverside County Supervisor District 3

KOHL RANCH COMPANY, LLC  
KOHL RANCH II, LLC  
11990 San Vicente Boulevard, Suite 200  
Los Angeles, California 90049

February 14, 2012

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**4. Conclusion**

The draft RTP/SCS represents a substantial and important regional planning effort. We believe the current draft needs to be corrected to reflect current local land use planning decisions, and to ensure that the regional growth projection process is not implemented in a manner that infringes on either vested property rights or the land use authority of local jurisdictions. We appreciate SCAG's consideration of the comments provided in this letter and look forward to your responses. If you should have any questions, please do not hesitate to contact me.

Sincerely,

KOHL RANCH COMPANY, LLC,  
a California limited liability company

By: KF Master Investments, LP,  
a California limited partnership  
Its: Member

By: KFO Capital Management, LLC,  
a California limited liability company  
Its: General Partner

By: Stephanie S. Cohen  
Stephanie S. Cohen  
Its: Secretary

KOHL RANCH II, LLC,  
A California limited liability company

By: KF Master Investments, LP,  
a California limited partnership  
Its: Member

By: KFO Capital Management, LLC,  
a California limited liability company  
Its: General Partner

By: Stephanie S. Cohen  
Stephanie S. Cohen  
Its: Secretary

cc: Supervisor Jeff Stone, Riverside County Supervisor District 3

# Additional Support for Highgrove Metrolink Station

Prepared Feb. 10, 2012

Here are some additional requests for a Highgrove Metrolink Station to add to the: “8 years of Comments” and “Supporting Docs” that are displayed on the website:

[www.highgrovehappenings.net](http://www.highgrovehappenings.net)

Received via e-mail:

<u>Name</u>	<u>Date</u>
Dan Lindholm	1-11-12
Bobbie Benson	1-12-12
Bill Holland	1-12-12
Betty Crossno	1-13-12
Kevin and Karen Collier	1-13-12
Tammy Matteson	1-13-12
Greg April	1-14-12
Lloyd Spiker	1-14-12
Marilyn Denney	1-17-12
Kelly Keough	1-18-12
Jim McKee	1-18-12
Terry Reagan	1-21-12
Riverside Press: letter to editor	1-23-12
<b>Letter of support from City of Loma Linda</b>	<b>1-26-12</b>
Dale Crossno	1-28-12
Virginia Washburn	2-2-12
Dave Mathers	2-2-12
Marie Thomas	2-2-12
Patricia Kinion	2-2-12
Ken and Karen Hughes	2-2-12
JoAnn Johnson	2-3-12
Steve Dawson	2-3-12
Gary Laesser	2-7-12

**The City of Loma Linda has supported the Highgrove Metrolink Station for 10 years. Their first letter of support was dated Jan. 24, 2002.**

It is unfortunate that the Highgrove location continues to be downplayed for such a long period of time. For over 10 years, surrounding cities, civic organizations and local residents have requested a Metrolink station at Highgrove. But city resolutions, letters, and the public comments made at the RCTC meetings continue to be ignored.

RCTC now owns the property at Highgrove and according to Ann Mayer, Executive Director of the Riverside County Transportation Commission, RCTC bought the 17.22 acres of vacant land to enable the Perris Valley Line railroad track to connect to the BNSF main line track.

The excess land that RCTC does not need would be an ideal location for the SCAG **Regional Transportation Plan** for commuters between San Bernardino County and Riverside County.

On Jan. 18, 2012 I spoke at the SCAG **Regional Transportation Plan** meeting in San Bernardino under public comments and submitted written documentation that contained 29 items that included a colored map, city resolutions and letters of support from elected officials and local residents. Some of these items date back to 2001. This information was given to Justine Block who is SCAG's Deputy Legal Council in Los Angeles.

Copies of the above e-mail have been sent to SCAG, prior to the Feb. 14, 2012 deadline for public input for their Regional Transportation Plan. The above list is also being sent to RCTC and SANBAG representatives.

Please look at the new map and the related information on: [www.highgrovehappenings.net](http://www.highgrovehappenings.net) that shows the Highgrove Metrolink Station north of the proposed curved track. RCTC's property at Highgrove should be used for the SCAG Regional Transportation Plan due to the ideal location, existing commuter trains, and growth potential due to hundreds of acres of nearby lots ready for homes. This location is way too important to continue to be ignored!



R. A. "Barney" Barnett

Chmn.: Highgrove Municipal Advisory Council

Editor: Highgrove Happenings Newspaper

474 Prospect Ave.

Highgrove, Ca.

92507

(951) 683 4994

[highgrovenews@roadrunner.com](mailto:highgrovenews@roadrunner.com)



# City Of Loma Linda

25541 Barton Road, Loma Linda, California 92354-3160 • (909) 799-2800 • FAX (909) 799-2890  
Sister City — Manipal, Karnataka, India

January 24, 2002

R. A. Barnett, Chairman  
Highgrove Area Redevelopment  
474 Prospect Avenue  
Highgrove, CA 92507

Dear Mr. Barnett:

Subject: Metrolink Station Stop In Highgrove

This is to advise that the City Council, at the regular meeting of January 22, unanimously supported your efforts and the Riverside County Service Area 126 Advisory Board's recommendation to the Riverside County Transportation Commission to site a Metrolink station stop in Highgrove.

Councilman Christman serves as president of the SANBAG Board and noted that Board's interest in a station stop in Highgrove.

Please keep us apprised of the status of the project.

Sincerely,

Pamela Byrnes-O'Camb  
City Clerk



# City of Loma Linda

25541 Barton Road, Loma Linda, California 92354-3160 • (909) 799-2800 • FAX (909) 799-2890

Sister Cities: Manipal, Karnataka, India - Libertador San Martín, Argentina • [www.lomalinda-ca.gov](http://www.lomalinda-ca.gov)

January 26, 2012

R. A. Barnett, Chairman  
Municipal Advisory Council  
474 Prospect Avenue  
Highgrove, CA 92507

Subject: Metrolink Station Stop In Highgrove

Dear Mr. Barnett:

Thank you for providing the City Council with an update on not only the Spring Mountain Ranch Housing Project, but also the potential for a Metrolink station stop in Highgrove.

The Loma Linda City Council reaffirms its previous support of your efforts and the Municipal Advisory Council's recommendation to the Riverside County Transportation Commission to site a Metrolink station stop in Highgrove.

Please keep us apprised of the status of the project.

Sincerely,

Rhodes Rigsby, Mayor

## **Ardie/Barney Barnett**

---

**From:** RooferDan@aol.com  
**Sent:** Wednesday, January 11, 2012 10:46 PM  
**To:** highgrovenews@roadrunner.com  
**Subject:** We want a Highgrove Metrolink station

## **Ardie/Barney Barnett**

---

**From:** TrnBrat1@aol.com  
**Sent:** Thursday, January 12, 2012 6:21 PM  
**To:** highgrovenews@roadrunner.com  
**Subject:** RR Stop

With the traffic jams all over the freeways it would be a perfect place to get off and park and get on the train and leave the driving to the hoghead. Also you'll be more rested at the other end since your not a jumble of nerves from the drive. Also coming from Palm Springs or San Diego area it would be a break to just take a train the rest of the way and know your not going to be stuck in traffic for several hrs. Bobbie Benson

## **Ardie/Barney Barnett**

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**From:** Bill Holland [billybyu@gmail.com]  
**Sent:** Thursday, January 12, 2012 9:51 AM  
**To:** Ardie/Barney Barnett  
**Subject:** Fwd: Metrolink station

Begin forwarded message:

**From:** Bill Holland <billybyu@gmail.com>  
**Date:** January 12, 2012 9:47:49 AM PST  
**To:** "Amatya@scag.ca.gov" <Amatya@scag.ca.gov>  
**Subject:** Metrolink station

We need a Metrolink station here in Highgrove....More and more people .... New schools & churches...Highgrove is growing, Freeways are congested.....  
Thankyou for your attention to this matter....

**Ardie/Barney Barnett**

---

**From:** Betty Crossno [boop01@pacbell.net]  
**Sent:** Friday, January 13, 2012 11:14 AM  
**To:** Amatya@scag.ca.gov  
**Cc:** Barney Barnett  
**Subject:** METROLINK STATION IN HYGROVE

WE NEED A METROLINK SAION IN HYGROVE. MOST CONVIENT AS I LIVE IN GRAND TERACE AMD IS BEST FOR MY NEEDS AS I HAVE TO DEPEND ON PUBLIC TRANSPORAION.

**Ardie/Barney Barnett**

---

**From:** Kevin and Karen [colliernitro@gmail.com]  
**Sent:** Friday, January 13, 2012 8:21 AM  
**To:** Amatya@scag.ca.gov  
**Cc:** Ardie/Barney Barnett  
**Subject:** Highgrove Metrolink Station

WE WANT A HIGHGROVE METROLINK STATION!

As guardians of taxpayer transportation funds, SCAG must consider the BEST POSSIBLE usage of those funds for the community they serve. As clearly explained numerous times by Mr. Barnett and other members of this and the surrounding communities, a Metrolink Station in Highgrove, where there is ALREADY existing railroad tracks, existing Metrolink trains, existing acreage suitable for construction of the station and parking accommodations, and hundreds of up and coming home sites (Spring Mountain Ranch), it is imperative that the members of this agency decide WISELY to construct the METROLINK STATION IN HIGHGROVE.

Thank you,  
Karen and Kevin Collier  
235 Goldfinch Lane  
Highgrove, Ca. 92507

**Ardie/Barney Barnett**

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**From:** WONDERFULTAMMY@aol.com  
**Sent:** Friday, January 13, 2012 9:04 AM  
**To:** Amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** "We want a Highgrove Metrolink station"

Highgrove is a perfect location because it already has the existing railroad tracks, existing Metrolink trains 7 days a week, plenty of room for parking, and hundreds of acres of former orange groves have been converted into pads for future homes.

---

Tammy Matteson

951-203-7467

**Ardie/Barney Barnett**

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**From:** Greg Apprill [highgrovepony@yahoo.com]  
**Sent:** Saturday, January 14, 2012 9:34 PM  
**To:** lieb@scag.ca.gov; amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com; highgrovepony@yahoo.com  
**Subject:** Highgrove, CA - "We want a Metrolink station"

1/13/2012

**Mr. Jacob Lieb**  
**SCAG**  
**818 W. 7th Street, 12th Floor**  
**Los Angeles, CA 90017-3435**

**Dear Mr. Lieb,**

**"WE WANT A METROLINK STATION" in Highgrove, CA.**

**Our community would support and embrace a station. This is the type of economic development and land usage we are looking for.**

**Thank you,**  
**Greg Apprill**  
**President**  
**Highgrove Pony Baseball League**  
909-322-7280 cell  
[highgrovepony@yahoo.com](mailto:highgrovepony@yahoo.com)  
[highgroveponyleague.com](http://highgroveponyleague.com)

**From:** Lloyd Spiker [mailto:lloyd.spiker@gmail.com]  
**Sent:** Friday, January 13, 2012 2:25 AM  
**To:** [Amatya@scag.ca.gov](mailto:Amatya@scag.ca.gov)  
**Cc:** [highgrovenews@roadrunner.com](mailto:highgrovenews@roadrunner.com)  
**Subject:** Highgrove Metrolink Station

We want a Highgrove Metrolink station. As a senior citizen, I feel this would be a vital asset to our community and help boost the economy of Riverside.

thanks  
Lloyd Spiker  
Highgrove

## **Ardie/Barney Barnett**

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**From:** MARILYN MARILYN [marilyndenney@sbcglobal.net]  
**Sent:** Tuesday, January 17, 2012 3:45 PM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** METROLINK STATION WANTED IN HIGHGROVE!

PLEASE! See to it that a Metrolink station is provided in HighGrove, CA

Thank you,!

Marilyn Denney  
Resident of Grand Terrace, CA

## **Ardie/Barney Barnett**

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**From:** kelly keough [g.t.c.2004@sbcglobal.net]  
**Sent:** Wednesday, January 18, 2012 11:08 AM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metrolink Station

Just a note to let you know that I am in support of a Highgrove Station

Thanks

Dr. Kelly P. Keough

## **Ardie/Barney Barnett**

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**From:** Jim McKee [jmnatural@netzero.net]  
**Sent:** Wednesday, January 18, 2012 6:51 AM  
**To:** amatya@scag.ca.gov; Barney Barnett  
**Subject:** metro-link station in highgrove, ca.

we want our Federal and State tax money to benefit residents in both counties by building a Metrolink Station in Highgrove

## **Ardie/Barney Barnett**

---

**From:** Terry Reagan [realtor.reagan@gmail.com]  
**Sent:** Saturday, January 21, 2012 6:22 PM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** IE Metrolink Station

To All Concerned:

We support having the proposed Metrolink Station built in Highgrove. It just makes sense!

Margaret and Terry Reagan  
Local Residents

## **Ardie/Barney Barnett**

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**From:** Dale Crossno [dcrossno@pacbell.net]  
**Sent:** Saturday, January 28, 2012 3:01 PM  
**To:** Amatya@scag.ca.gov  
**Subject:** Highgrove Metrolink station

To the responsible board or person,

I have followed the many discussions in regards to the Metrolink rail from Riverside to Perris. There is no way I can understand any reason to not have a station in Highgrove. I have seen many resolutions from varies cities and requests from residents asking for this station. If I understand all of this correctly this station will be very convenient for many residents in both Riverside and San Beranardino counties who can use the Metrolink service form the Highgrove station but would essentially have very little use of this service from the Hunter Park proposal. I believe us tax payers funding this project deserve the route that will serve the most people. Thank you for any consideration for us tax payers in your decision regarding this project.

Dale Crossno  
22668 Arliss Dr.  
Grand Terrace, Ca. 92313  
909 825 6963

## **Ardie/Barney Barnett**

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**From:** Virginia Washburn [washburn\_virginia@yahoo.com]  
**Sent:** Thursday, February 02, 2012 8:42 AM  
**To:** highgrovenews@roadrunner.com  
**Subject:** WE SUPPORT METRO LINK STATION AT HIGHGROVE, CA

WE SUPPORT METROLINK STATION AT HIGHGROVE, CALIFORNIA Thank you

**Ardie/Barney Barnett**

---

**From:** Marie Thomas [mgdmarie11@yahoo.com]  
**Sent:** Thursday, February 02, 2012 10:37 AM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metrolink Station

We support a Metrolink Station at Highgrove!

We respectfully request a true consideration of this proposal.

Thank You,

David Mathers  
Marie Thomas

**Ardie/Barney Barnett**

---

**From:** Patricia Kinion [patkin32000@yahoo.com]  
**Sent:** Thursday, February 02, 2012 9:08 AM  
**To:** highgrovenews@roadrunner.com  
**Subject:** metrolink at Highgrove

We support a metrolink station at Highgrove.

**Ardie/Barney Barnett**

---

**From:** Ken Hughes [kenhughes997@yahoo.com]  
**Sent:** Thursday, February 02, 2012 12:35 AM  
**To:** amatya@scag.ca.gov  
**Cc:** Ardie & Bernie Barnett  
**Subject:** Metrolink Station

***“We support a Metrolink Station at Highgrove”***

Ken & Karen Hughes, 232 Cliffhill Place,  
Riverside, Ca., 92501

## **Ardie/Barney Barnett**

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**From:** JoAnn Johnson [kg6nsdjoann@yahoo.com]  
**Sent:** Friday, February 03, 2012 12:41 PM  
**To:** amatya@scag.ca.gov  
**Cc:** Highgrove Happenings  
**Subject:** Metrolink and Highgrove

I have long been an advocate for a Metro Link Station at Highgrove.  
I believe it would be a distinct advantage to a large area, including Grand Terrace.  
Please consider seriously.  
JoAnn Johnson  
Grand Terrace

## **Ardie/Barney Barnett**

---

**From:** Stephen Dawson [stdawson@charter.net]  
**Sent:** Friday, February 03, 2012 2:17 PM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metrolink Highgrove

It is imperative that Highgrove have a Metrolink station easily accessible to the citizens of Highgrove. The proposed Marlborough station does not service the Highgrove area and is very difficult for the Highgrove residents to access. Please assist the residents of Highgrove to achieve the long sought Metrolink station in Highgrove.  
Thank you for assistance.  
Stephen T. Dawson  
5020 Sepulveda Avenue  
San Bernardino, CA 92404

## **Ardie/Barney Barnett**

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**From:** Gary Laesser [garylaesser@att.net]  
**Sent:** Tuesday, February 07, 2012 11:11 AM  
**To:** amatya@scag.ca.gov  
**Cc:** highgrovenews@roadrunner.com  
**Subject:** Metro Link Station

*Gentlemen,*

*this email is concerning a Metro Link Station in Highgrove, CA. It would be nice to have this station*

*because it would cut traveling for the citizen of Grand Terrace and other local communities to easier San Bernardino or Riverside.*

*The train is already going thru there, why can't it stop.*

*Thank you for your consideration in this matter.*

*Gary & Burga Laesser-*

est in knowing how the state's prisons operate, without any official filtering of information. Inmate interviews provide crucial insights into the workings of the criminal justice system. Such scrutiny is essential to providing public accountability for the corrections system and the officials in charge of it.

And taxpayers have a legitimate need to keep close watch on the state's prisons. The Legislature's long history of negligence and irresponsibility let prison ills fester, with dismal public consequences.

Corrections costs accelerated over the past 15 years, adding to state budget woes. California will spend about \$9 billion on corrections this fiscal year — more than the state general fund will contribute to the University of California

should avoid glamorizing criminals. That argument was always flimsy, mindlessly equating news reports with public relations.

The media restrictions are more likely an effort to control negative publicity. Corrections officials instituted the regulations in 1996, after reports of excessive violence and abuses at Pelican Bay State Prison. The reporting grew out of a 1995 federal court ruling that ordered sweeping reforms at the maximum security facility.

Prison policy should have a higher goal than avoiding unflattering news reports. Blocking media coverage deprives the public of a clear understanding of prison issues — which is the worst possible approach for a system in crisis. Public safety should not mean protecting the public from an honest picture of the corrections system.

## JOIN THE DISCUSSION

**W**e encourage readers to address public issues in letters of up to 200 words and op-eds of up to 600 words. We favor submissions offered exclusively to The Press-Enterprise. We require the writer's full name, street address and telephone number for verification.

We do not publish any individual's work more than once every 30 days. We do not publish poetry, withhold names on submissions or print letters cribbed from other sources.

All letters are subject to editing and may be republished in any format. For more detailed guidelines on submitting letters, visit PE.com.

MAIL: Opinion, Box 792, Riverside 92502

FAX: 951-368-9023

E-MAIL: letters@PE.com (no attachments)

## Votes add up to 'same old'

Dennis Mackey rightly condemns the California Legislature's outrageous salaries, perks and per diems, and its cuts in aid to the old, disabled and poor ("Vote all of them out," Your Views, Jan. 13).

It's easy to see that this state's lawmakers are incompetent. In the past few years, I've read countless letters and editorials calling for their removal by the voters.

But people complain about government, then vote in the same politicians and complain some more. Are the lawmakers the only ones who are incompetent?

PAUL HEARD  
Moreno Valley

## Direct democracy works

In his letter, Keith Richards writes, "Our elected officials don't represent us" ("Make voting mandatory," Your Views, Jan. 15).

In fact, they go to the highest bidder. The framers of the Constitution could not foresee the appearance of huge transnational corporations that are concerned only with profit and do not care about the countries in which they conduct business. What was supposed to be a democratic republic has devolved into a commercial republic. Corporate money buys elections and politicians.

We need to continue the direct democratic procedures that came into being in the last century: initiative, referendum and recall. This could be done through the Internet, backed up by a paper vote. Then you'll see a 90 percent turnout.

ART KOERTZ  
Riverside

## Left steers us onto rocks

Kudos to Fred Zerkle for his new word ("Behold an 'ineptocracy,'" Your Views, Jan. 12), which perfectly describes the far-left secular movement that has infected our country.

The Obama administration is the standard bearer for this movement, which shows nothing but disdain for achievement, success, personal accountability, family values and national security.

The wealthy left, including President Barack Obama, George Soros, the Hollywood elite and many others, are destroying the system that allowed them to garner such wealth.

It doesn't figure. One would think these people would be big supporters of capitalism, free enterprise and democracy. Instead, they are doing their best to turn this once-great nation into a cesspool of entitlements, government control, high taxes and redistribution of wealth.

How much of their wealth are they willing to redistribute?

CHUCK R. BOLTON  
San Jacinto

## OK Highgrove rail station

Hasan Ikhtrata, executive director of the Southern California Association of Governments, describes SCAG's 2012-2035 plan for infrastructure investments in transportation that will cost \$500 billion over the next 23 years ("Transportation upgrades can fuel growth engine," Perspective, Jan. 8).

But I'm reminded of the request by Grand Terrace more than 10 years ago for a Metrolink station in Highgrove that would benefit Grand Terrace, Highgrove and surrounding communities on both sides of the Riverside/San Bernardino county line.

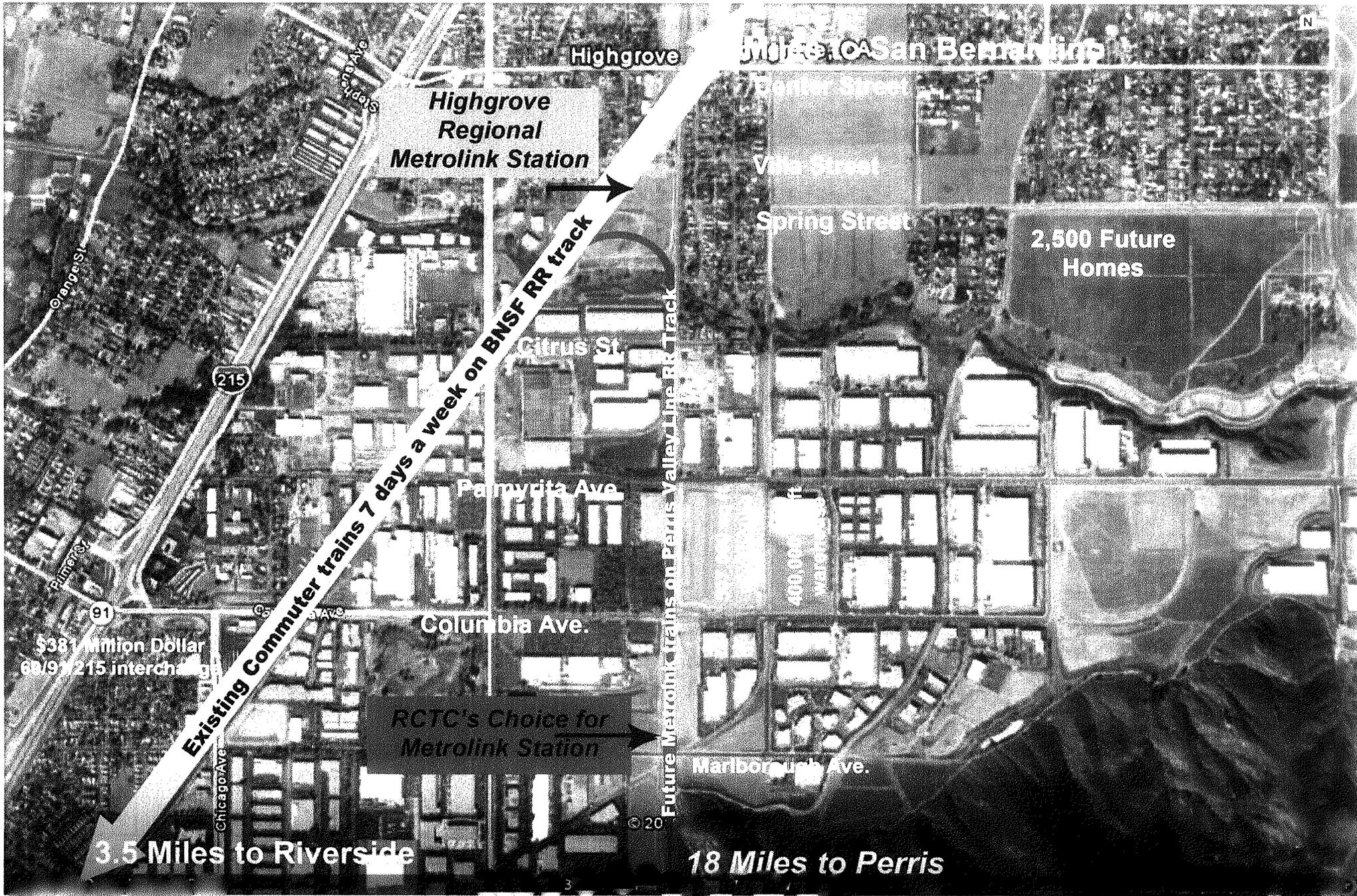
Ikhtrata writes that investing in transportation infrastructure is one of the fuels needed to rebuild our economy. Very little investment is needed for the Highgrove location because commuter trains have been operating past this location for 10 years. If movement of people is part of SCAG's plan as mentioned, what happened to the Metrolink station in Highgrove?

We have a ready customer base for the Highgrove station.

PHIL TURNER  
Grand Terrace

# GOP'S CLASS-WARFARE RHETORIC GIVES OBAMA A LUCKY LIFT

RIVERSIDE PRESS 1-23-12

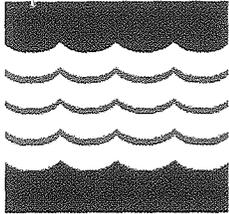


## HIGHGROVE REGIONAL METROLINK STATION

Index of information given to SCAG for **Regional Transportation Plan**

Jan. 18, 2012

1. Colored map of proposed Highgrove Metrolink Station location
2. Description of map and supporting information
3. Enlarged view of proposed parking lot showing 725 spaces
4. 5 pages of comments over the last 8 years
5. Letter from Supervisor Ashley 10-14-2009
6. Letter from Transit Coalition 9-19-2009
7. Resolution from City of Grand Terrace 12-13-2001
8. Petition from Project Area Committee 1-08-2002
9. Resolution from City of Loma Linda 1-24-2002
10. Letter from Assemblyman Bill Emmerson 8-14-2006
11. Letter from Supervisor Bob Buster 7-17-2006
12. Comments from Buster, Ashley and Haley 10-11-2006
13. Letter from Eric Haley about Hi-Rail tour 11-28-2006
14. Agenda from La Quinta Workshop 9-15-2006
15. Article from San Bernardino Sun 1-1-2007
16. Letter from Riverside Land Conservancy 10-18-2005
17. Letter from Melanie Zimmermann 10-09-2006
18. Letter from Wendy Eads 3-15-2006
19. Letter from University Neighborhood Association 10-21-2005
20. Letter from Byron Matteson 6-23-2006
21. Letter from Tony Petta 6-23-2006
22. Letter from Maryetta Ferre' 3-15-2007
23. Letter from Hugh Grant 6-21-2006
24. Letter from Asst. City Mgr. of Grand Terrace 5-15-2003
25. Letter from Franklin Carpenter Jr. 5-28-2001
26. Letter from JoAnn Johnson 11-04-2006
27. Letter from Bixby Land Co. 12-12-2005
28. Letters from Carol Williams and Clifford Berger 3-30 & 3-31-2007
29. Letter from Dom Betro 3-21-2006



**SOUTH BAY CITIES**  
COUNCIL OF GOVERNMENTS

5033 Rockvalley Road  
Rancho Palos Verdes, CA 90275  
(310) 377-8987  
[sbccog@southbaycities.org](mailto:sbccog@southbaycities.org)  
[www.southbaycities.org](http://www.southbaycities.org)

**RECEIVED**

February 13, 2012

**FEB 15 2012**

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

**SOUTHERN CALIFORNIA ASS'N.  
OF GOVERNMENTS**

Dear Hasan,

On behalf of the South Bay Cities Council of Governments (SBCCOG), I would like to congratulate you and your staff for the excellent work preparing the complex 2012 RTP including the region's initial SCS, associated Appendices and Program Environmental Impact Report (PEIR). Thank you for this opportunity to comment on the draft documents.

The SBCCOG lacks the resources to comprehensively review and comment on the RTP and PEIR. We have reviewed the comments being submitted by the Orange County and Gateway Cities Councils of Governments and are in general support them.

In particular, we want to reinforce the following:

- Gateway COG's question regarding the Financial Plan - Table 3.4.1 which presents Core and Reasonably Available local sources of revenue and includes development mitigation fees for Orange and Riverside Counties. Does the revenue estimate include any assumption of funds from the potential adoption of a development fee in Los Angeles County?
- OCCOG's request regarding the Mitigation Monitoring Program mentioned in the PEIR to clarify what obligations local agencies may have regarding SCAG's mitigation monitoring efforts.
- OCCOG's request that SCAG provide the mitigation measures as a "toolbox" to local agencies for use within their discretion if and when appropriate for projects within their respective jurisdictions.
- OCCOG's request that SCAG adopt growth forecast numbers at the county level rather than lower geographical levels such as city or census tract.

Our focus was on the SCS portion of the RTP. Our comments address strategies included in Tables 4.3 and 4.4 and we request the following changes:

**LOCAL GOVERNMENTS IN ACTION**

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita  
Los Angeles Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills  
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

### **Land Use Actions and Strategies, Table 4.3**

#### **Add the following new options:**

Update local zoning codes, General Plans and other regulatory policies and pursue opportunities to develop appropriately scaled mixed office-retail commercial centers within walking distance of residential neighborhoods

Responsible parties: Local jurisdictions

Update local zoning codes, General Plan and other regulatory policies to accelerate adoption of land use strategies that will over time convert auto oriented intersections of major arterials into mixed office-retail commercial centers.

Responsible parties: Local jurisdictions

Expand Compass Blueprint priorities to support member cities and sub-regional COGs adopting neighborhood oriented development as a land use strategy and range-limited electric vehicles as a mobility strategy.

Responsible parties: Local jurisdictions, COGs, SCAG

#### **Amend the following existing options (as indicated in italics):**

Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the RTP/SCS Alternative, *or that have been formally adopted by any sub-regional COG that is consistent with regional goals.*

Responsible parties: Local jurisdictions

Pursue joint development opportunities to encourage the development of housing and mixed-use projects around existing and planned rail stations, along high-frequency bus corridors, in transit oriented development *and in neighborhood oriented development.*

Responsible parties: Local jurisdictions, CTCs

Support projects, programs, policies and regulations to protect resource areas, such as natural habitats and farmland from future development; and *support project, programs, policies, and regulations that lead to development of "complete communities" on greenfields. (A diversity of housing choices and educational opportunities; jobs for a variety of skills and education; recreation and culture; a full-range of shopping, entertainment and services; all within a relatively short distance)*

Responsible parties: Local jurisdictions, SCAG

### **Transportation Network Actions and Strategies, Table 4.4**

#### **Add the following new options:**

Promote the use of range-limited battery electric vehicles through land use policies that bring origins and destinations closer together such as the neighborhood oriented development strategy; and through transportation infrastructure such as complete streets (designed to accommodate slow speed electric vehicles) and EVSE deployment in homes and in public parking lots.

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive (DRT) in order to both serve and encourage development of compact neighborhood centers.

Responsible parties: CTCs and municipal transit operators

Ensure every sub-region has multiple access points to the regional high speed transit network with at least one of them being a candidate for development into a multi-mobility hub (MMH).

Responsible parties: CTCs and local jurisdictions

Lobby the state to provide funding for complete streets planning and implementation in support of reaching SB 375 goals.

Responsible parties: SCAG, State

**Amend the following existing options (as indicated in italics):**

Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities, accessibility to transit via non-auto modes *and ZEV modes, and accessibility via ZEV modes.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations *and neighborhood commercial centers.*

Responsible parties: Local jurisdictions, SCAG

Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, HQTAs, and *neighborhood commercial centers* providing an incentive for residents and employees to make trips on transit *and/or stay in the local communities.*

Responsible parties: Local jurisdictions, SCAG, and CTCs

Develop first mile/last mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking or *driving neighborhood electric vehicles or other ZEV options.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Encourage the development of a Complete Streets policy, *explicitly accommodating slow speed and other ZEVs.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Develop infrastructure plans and educational programs to promote active transportation *and ZEV options.*

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Emphasize active transportation projects *and slow speed ZEV modes* as part of complying with the Complete Streets Act

Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs

Collaborate with local jurisdictions *and sub-regional COGs* to develop regional policies regarding TSM

Responsible parties: Local jurisdictions, COGs, SCAG,

Collaborate with local jurisdictions *and sub-regional COGs* to update the ITS inventory.

Responsible parties: Local jurisdictions, COGs, SCAG

Collaborate with the State and Federal Government *and sub-regional COGs* to examine potential innovative TDM strategies

Responsible parties: SCAG, State and COGs

In addition, the 2012 RTP should include a preliminary cost estimate for implementing the Regional PEV Readiness Plan and the sub-regional strategies to develop infrastructure and supportive land uses mentioned in Table 4.7. The completed PEV Readiness Plan will provide such an estimate however that will occur after RTP adoption so that an estimate as place holder should be added in this plan.

Once again, thank you for the opportunity to respond.

Sincerely,

A handwritten signature in cursive script that reads "Ellen Perkins".

Ellen Perkins, SBCCOG Chair  
Councilmember, City of Palos Verdes Estates

cc: Pam O'Connor, SCAG President



**OPPOSITION GROUPS ( PARTIAL LIST )**

Caltrans Tenants of the 710 Corridor  
Natural Resources Defense Council  
East Yard Communities for Environmental Justice  
Glassell Park Improvement Association, Land Use Committee  
Far North Glendale Homeowners Association  
Crescenta Valley Town Council  
La Cañada Flintridge Unified School District  
LA RED, El Sereno

**Green Scissors 2011 Report Groups**

Friends of the Earth  
Taxpayers for Common Sense  
Heartland Institute  
Public Citizen

**INJUNCTION PLAINTIFFS**

City of South Pasadena  
Sierra Club  
National Trust for Historic Preservation  
California Preservation Foundation  
Los Angeles Conservancy  
Pasadena Heritage  
South Pasadena Preservation Foundation  
South Pasadena Unified School District

**LOS ANGELES  
NEIGHBORHOOD  
COUNCILS**

Arroyo Seco  
Cypress Park  
Eagle Rock  
El Sereno  
Glassell Park  
Highland Park  
Lincoln Heights  
Sunland-Tujunga

**CITIES**

City of Glendale  
City of Los Angeles  
City of La Cañada Flintridge  
City of South Pasadena

Post Office Box 51124

Pasadena, California 91115

Telephone 626 799.0044

no710extension@aol.com

January 30, 2012

**Southern California Association of Governments  
Attention: Margaret Lin  
Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017**

Sent via email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

**Subject: Comments on SCAG DRAFT 2012 RTP**

**Who We Are**

The No 710 Action Committee is a grassroots organization with members from the northeast area of Los Angeles and surrounding communities, including Alhambra, Eagle Rock, El Sereno, Highland Park, Glassell Park, Glendale, La Crescenta, La Canada, Los Angeles, Pasadena, and South Pasadena. Our group is comprised of residents as well as business and health professionals from diverse backgrounds and communities who are committed to improving transportation modes across and within the County. Our members include community organizers and activists, engineers, elected officials, scientists, economists, physicians and other health care professionals. Cities, neighborhood councils and groups that have taken official positions against the SR-710 extension represent over 500,000 people.

Through decades of involvement in 710-related issues, we have exhaustively researched multiple aspects of our region's transportation issues including pollution and health concerns, contemporary advances in freight movement, mass transit, traffic calming strategies and more. We support projects that are environmentally responsible and financially prudent, projects that will have benefit for the entire region. Since the proposed SR-710 Extension Toll Tunnels would not improve our regional mobility and air quality, but would actually worsen them, we recommend alternative solutions.

### **Objections to the RTP**

We urge SCAG policymakers to **remove from the RTP all line items associated with expanding and extending the 710 freeway**, and remove from the RTP all items associated with expanding and increasing *existing* infrastructure and technology for goods movement in the region.

In addition, the No 710 Action Committee notes that SCAG must move the proposed SR-710 Extension Toll Tunnels from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law to include them in the Constrained Plan.

We oppose SCAG RTP items associated with proposed SR-710 Toll Tunnels because **they will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks in our communities and throughout the region**. We oppose related plan items which have the goals of increasing conventional roadway and rail yard capacity for the same reasons. The Programmatic Draft Environmental Report for the Plan is inadequate, as is stated in an addendum to this letter. These approaches are outdated, inefficient, and harmful to the region. **Better, zero-emission proposals for goods movement are available now – we should not wait another 20 years.**

### **Air Quality and Congestion**

Goods movement proposals in the Draft Plan are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan. The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (p. 68), yet allocates billions of dollars to expanding existing systems, with no requirement that new technology be implemented.

The plan says that “truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety..and provide a platform for the introduction and adoption of zero-emission technologies.” However, the plan does not require zero-emission technology (which truck operators will be reluctant to invest in because of the added expense), assumes and accommodates more trucks on the road en route to proposed freight corridors, and allocates billions to construction of these corridors instead of electrified rail freight movement projects which would eliminate many trucks from inner-city traffic altogether.

### **Health Impacts and Environmental Justice**

The plan acknowledges environmental justice legislation at the federal and state level in detail and pledges SCAG's compliance with the spirit of these laws. It proposes to address freight movement and rail emissions-related impacts, but it avoids mention of significant and sustained community opposition to the BNSF SCIG, which is on the Project List. The No 710 Action Committee opposes the SCIG in solidarity with the Coalition for a Safe Environment and other community groups that have repeatedly presented their comments and concerns related to environmental justice. These communities experience far higher than average freight truck traffic and host undesirable intermodal freight facilities. The resulting higher than average health, quality of life, life expectancy and safety problems are well documented. However, the existence of their concerns and specific objections to the SCIG are completely ignored and not mentioned in this Draft Plan or its appendix on Environmental Justice. The No 710 Action Committee repeats that SCIG and related Draft Plan components are part of an overall framework which favors conventional goods movement activities that cause significant pollution and negative impacts in neighboring communities and throughout the region.

### **Jobs**

Job creation and retention goals in this Draft Plan represent “mission creep” and tilt towards requiring more trucks, more freeways, more traditional rail infrastructure, and more conventional port transfer and loading. We oppose this direction because it is part of a conceptual framework that includes the proposed SR-710 Toll Tunnels and the associated negative impacts mentioned above: pollution, truck traffic, congestion, accidents, health and environmental risks. The Port Working Group, a community coalition, has noted that the SCIG plan claims to add 400 permanent jobs, but existing businesses at the proposed site provide more than 1,200 permanent jobs, resulting in an overall reduction. Further, many of the construction jobs are not permanent, and not guaranteed to be awarded locally.

The No 710 Action Committee urges regional mobilization focusing on multi-modal transit and goods movement projects using electrified rail and zero emission technology. These will also create jobs, but the approach is forward-looking in terms of job and skills training and future infrastructure needs. In addition, more efficient, lower-cost goods movement technology will allow the Southern California region to attract jobs and new investment, competing effectively with other international and eastern seaboard ports' expansion and modernization.

### **Zero Emission Technology**

The plan refers to zero emission electrified rail technology as a long-term goal in sections of the report covering goods movement, congestion, air quality, transportation investments, and truck transport. It proposes a long-term, bureaucratic study. It does not acknowledge that specific patents, plans and technologies are currently being proposed and discussed by several parties. The Draft Plan indirectly and incorrectly implies that such technology cannot be implemented on an accelerated timetable. This is a matter of political will and private investment, not feasibility. The No 710 Action Committee objects to the Plan's time-delay in funding and implementing zero emission strategies, because the near-term alternatives proposed in the Draft Plan include extension and expansion of freeways (such as the 710) and traditional rail yards and goods movement infrastructure which will result in added pollution, truck traffic, congestion, accidents, health and environmental risks in the region.

### **Funding**

We question the revenue projections in the Draft RTP. The profitability of regional toll ways hasn't been demonstrated, and the exact uses of the proposed SR-710 Toll Tunnels haven't been determined (car only, truck only, both?) yet the SCAG RTP assumes a combined \$22.3 billion in revenues for the tunnels and other toll ways.

On the expense side, funding should be reallocated. The billions of dollars for freeway expansion, near-term dedicated truck lanes, the East-West Corridor, and conventional rail yard / truck loading should be spent on accelerated implementation of zero emission electrified rail freight movement and other multi-modal and active transportation projects.

The plan gives lip service to a modernized, zero emission freight movement system from ports to electrified rail, but allocates no funding for this important step that will dramatically reduce truck traffic and congestion, improve air quality and health/environmental impacts, and position this region as an efficient, low-cost, high-tech goods movement magnet.

The plan also admits that increased population, and a growing aging population, will need alternative forms of transportation as roads become more crowded in the region. More funding should be directed proportionally to active transportation: walking, biking, transit, and multi-modal planning. The No 710 Action Committee proposes that the SCAG RTP allocate a share of funding proportional to the anticipated users of and established needs for active transportation to foster

livable, sustainable neighborhoods throughout the region and meet AB32 and SB375 greenhouse gas emission goals.

**Vision**

Mobility, economy, and sustainability can all be advanced with the priorities and funding we propose. We urge SCAG to remove the SR-710 Tunnel from its Draft Plan, reject goods movement proposals that extend the last century's polluting and inefficient practices, and invest instead in forward-looking plans that will enhance the region's quality of life and economic prospects.

Claire Bogaard, Pasadena

Claire Bogaard

Susan Bolan, La Crescenta

A Z Bolan

Sam Burgess, Pasadena

Sam Burgess

Janet Ervin, Alhambra

Janet Ervin

Trisha Gossett, Highland Park

Trisha Gossett

Bill Graham, Burbank

Bill Graham

Don Jones, Eagle Rock

Don Jones

Elise Kalfayan, Glendale

Elise Kalfayan

Clarice Knapp, South Pasadena

Clarice Knapp

Harry Knapp, South Pasadena

Harry Knapp

Joanne Nuckols, South Pasadena

Joanne Nuckols

Carol Teutsch, Los Angeles

Carol Teutsch

Don Smith, Long Beach

Don Smith

Jan Soo Hoo, La Canada Flintridge

Jan Soo Hoo

Odom Stamps, South Pasadena

Odom Stamps

Sherry Stubbs, Glendale

Sherry Stubbs

Tom Williams, El Sereno

Tom Williams

## **Postscript and Addendum:**

### **PEIR**

Additional comments regarding the Draft Programmatic Environmental Impact Report (D-PEIR) shall be submitted separately and provide more detailed citations and comments which will demonstrate that the RTP as Project Description, Alternatives, and Mitigation sections of the PEIR, and the PEIR itself, are grossly inadequate and incomplete with regard to issues summarized below:

### **Summary Issues for 2035 RTP and RTP-Draft PEIR**

#### **1. Inadequate/Incomplete Project Description/Assessment for a Transportation Plan**

Both the RTP and the PEIR are incomplete and totally inadequate as only selective forecasted 2035 traffic flows are provided in the main chapters and appendices which do not allow the public to fully review and evaluate the assessment of impacts. This is especially important for the evaluation of Freight Movements within corridors between the San Pedro Ports and the High Desert Corridor and Colton/Inland Empire Logistics Areas. Specifically more than 15 values for 2035 freight flows are missing from the I-710, I-5, and I-210 segments in Figure 2.7 and Goods Movements Appendix. Similarly no freight movement values are provide for connectors to the High Desert Corridor via I-15, SR-14, SR-138, and I-15.

Without these values the Projects listed for 2035 (e.g., SR-710 North Extension, East-West Freight Way (SR-60), SR-14, SR-138, etc.) cannot be properly confirmed, impacts assessed, and tolls-revenue generation evaluated.

Truck traffic is a major congestion factor on all RTP freeways in central LA County and must be modeled and results provided for independent assessment.

The High Desert Corridor truck destination/origins are not provided as little or no employment or housing or other land use parameters are not provided for such a large project.

#### **2. SR-710 North Extension Project**

The SCAG 2035 RTP assumes a route of the SR-710 along the old surface freeway route from the I-10 to the I-210, although Caltrans and MTA and the Technical Advisory Committee for the Project have already delineated a 150 sq mi study area which could easily change the entire basis for traffic modeling of freight movements through the central Los Angeles County road system. Such changes would have significant effect on modeled freight traffic levels.

Similarly the SR-710 TAC are conducting traffic modeling which specifically is different from results show in the RTP and have commented that the SCAG-RTP Traffic Model does not appropriately model the SR-710 conditions for 2035 and before.

#### **3. Inadequate and Incomplete Port and Rail Facilities Descriptions and Alternatives**

The 2035 RTP remains totally focused on road truck movement of freight between the San Pedro Ports and the High Desert Corridor and Inland Empire Logistics Areas. Alternatives are being submitted to both Ports of Long Beach and Los Angeles for a major increase of direct Ship<->Rail – on-dock/in-port transfer facilities with rapid turnarounds of ships and unit trains between the Ports and Logistics Areas which will promote a rapid increase in the Alameda Corridor, Alameda Corridor East, and the new Alameda Corridor North to the High Desert Corridor Logistics Area. Estimated 10+ unit trains/hr (3 lines x 24 x 10 = 720 unit trains/day) would travel from Ports to the two Logistics Areas.

The RTP and PEIR have an unstated assumption that transfer facilities near the Ports are required to transfer freight from sea containers or 40 ft to US rail/truck containers of 53 ft. However, ships are already being refitted for the longer US containers for both West Coast Ports and for Panama shipping. Such project changes would largely eliminate any transfers in the Port region or the Logistics Areas.

Other issues will address in comments directly for the PEIR. As they stand now, both the 2035 RTP and PEIR are inadequate, incomplete, in error, and unsupported by information accessible to the Public and perhaps between Caltrans/MTA and SCAG regarding the SR-710 and its role in the RTP from Los Angeles County.

**4. PEIR Jobs/Employment  
Time and Totals  
High Desert Corridor and Logistics Employees**

**5. Social Economics – Tolls/ETC. Revenue Generation and Costs  
Constrained v. No Funding**

**CC:**

California Transportation Commission members  
Glendale Mayor and City Council members  
Glendale Transportation and Parking Commissioners  
La Canada Flintridge Mayor and City Council members  
Los Angeles Mayor and City Council members  
Pasadena Mayor and City Council members  
South Pasadena Mayor and City Council members  
South Pasadena Transportation Manager  
MTA Board members  
State Assembly Representatives - northeast LA, Glendale, Pasadena, and La Canada Flintridge  
State Senators – northeast LA, Glendale, Pasadena, and La Canada Flintridge  
Members of Congress – 29th, 31st – 39th, 46th Districts  
Crescenta Valley Weekly  
Glendale News-Press  
La Canada Valley Sun  
LA Streetsblog  
LA Weekly  
Long Beach Press-Telegram  
Los Angeles Times  
Pasadena Sun  
Pasadena Star-News  
Pasadena Weekly  
South Pasadena Review

February 13, 2012

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

**RE: Draft 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR) - COMMENT**

Dear Mr. Ikhata:

Based in America's sixth largest county, Orange County Business Council represents the largest and most innovative employers who comprise the economic engine of Southern California. We advance Orange County's economic prosperity while protecting a high quality of life.

We appreciate the monumental task of compiling the RTP/SCS and the PEIR and commend SCAG on its concerted effort to engage with the community and local jurisdictions in development of these mandated documents. In particular, SCAG has worked closely with Orange County to ensure that our own SCS met requirements while also addressing the needs of the community. We recognize the difficult position SCAG is in to do the same on a regional basis – meeting federal and state laws while also addressing the needs of very disparate communities in a geographically and socio-economically large and diverse region. However, in the effort to be all things to all groups, both documents suffer.

From the business community's perspective, the documents inadequately address the role of goods movement as part of the comprehensive transportation plan for a healthy and thriving region, as well as constrain opportunities to provide adequate housing options. In addition, the recognition of existing regulatory authority or local control is muted through the seemingly misplaced authority delivered in the mitigation measures. The following highlights some of these areas of concern.

**RTP/SCS**

- There are repeated references throughout the RTP/SCS that transportation projects “induce growth” which incorrectly implies a lack of coordination between land-use and transportation planning agencies and that there was insufficient effort in the planning process to accommodate for anticipated, organic, population growth. The RTP/SCS and the PEIR should differentiate between balanced, planned growth identified by local jurisdictions, and growth that is inconsistent with what is already being planned for at the local level.
- SCAG should identify in the plan the economic contribution of the goods movement sector to the regional and state economy and elevate the importance of the east-west corridor as critical to the future of California's position in the global economy.
- The RTP should explicitly state how any new user fees would be further defined, evaluated (both for economic and feasibility impacts), and advanced. In particular, the analysis should demonstrate the need for new revenues and how the new revenues are proposed to be invested, while also protecting existing transportation plans as identified by local transportation entities. Voter-approved projects funded by local sales tax measures must be protected.

- With the elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is highly problematic and ignores issues related to aging or inadequate infrastructure capacity and high development costs for higher density projects. It also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. Recommendations regarding land-use should take into account the region's unique communities, market forces, and take a flexible not proscriptive approach to protect regional diversity.
- Finally, since passage of SB 375, the State of California has de-funded transit, transportation and redevelopment support for local government. This continues years of state diversion of revenues from gasoline, sales, income and other taxes needed for local government programs. Local government cannot achieve these mandated changes without increased, not decreased, state support. SCAG should explicitly state the imperative for state support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to achieve mandated goals.

## PEIR

- With over 500 mitigation measures, half of them being proposed for the first time in a SCAG RTP, the PEIR raises significant concerns for the regulated community. Although SCAG has expressed in community meetings that the PEIR mitigation measures merely offer a “toolbox of possible solutions”, history shows that there are no such things as good intentions when it comes to the tortured CEQA process. The PEIR needs a clear explanation that lead agencies should select those measures that apply to a specific project. The final PEIR should not block the intent of SB 375 to provide CEQA streamlining for certain types of advantageous projects.
- The wording of the mitigation measures utilizing “can and should” incorrectly implies that mitigation measures are feasible for the identified agencies. SCAG should provide a clear statement that all mitigation measure recommendations are advisory and replace the “can and should” phrase with “may” when referencing mitigation measures.
- Multiple mitigation measures appear to exceed SCAG's authority and responsibilities for implementation and have nothing to do with the RTP/SCS or its impacts. Further, many of these mitigations could create conflict with existing regulations. For example, the requirement for local jurisdictions to implement individual “climate action plans” is contradictory to the regional planning undertaken in the SCS. These mitigation measures that have nothing to do with the regional planning for future development or emissions from vehicular use should be restated or removed as appropriate.
- Perhaps to further clarify the intent, all mitigation measures not directly controlled by SCAG should be moved out of the PEIR document and into an appendix, which can be referenced as the “tool box” resource for consideration by other entities (a local jurisdiction, project sponsor, or other). However, this appendix would need to specifically state that no determination of feasibility on the measures has been made and that they are not intended to supersede any existing law or regulation.

We look forward to our continue partnership with SCAG and other business, housing and transportation entities as we all work to enhance the economic prosperity of the region and ensure a high quality of life. We respectfully ask SCAG to consider and address our comments in the RTP and PEIR revisions.

Sincerely,



Kate Klimow  
Vice President, Government Affairs



PAUL S. LEON  
MAYOR

SHEILA MAUTZ  
MAYOR PRO TEM

ALAN D. WAPNER  
JIM W. BOWMAN  
DEBRA DORST-PORADA  
COUNCIL MEMBERS

CHRIS HUGHES  
CITY MANAGER

MARY E. WIRTES, MMC  
CITY CLERK

JAMES R. MILHISER  
TREASURER

February 14, 2012

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

RE: Comments on 2012 RTP/SCS and PEIR

Dear Mr. Ikhata:

Thank you for allowing the City of Ontario the opportunity to review and comment on Southern California Association of Government's (SCAG's) draft 2012 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and the draft Program Environmental Impact Report (PEIR). On behalf of the City of Ontario I would like to express our sincere appreciation to you and SCAG staff for their professionalism, inclusiveness, and dedication to the immense task of coordinating and creating the region's first RTP/SCS regional plan. We support approval of the RTP/SCS Plan with some level of clarification and/or changes described below.

Overall, a recurring theme of our concerns is that the documents need to make clear SCAG's philosophy and intent on maintaining local government's sole control of land use decision making, including the review and establishment of mitigation measures under CEQA. Under your leadership SCAG has forged collaborative efforts with county and local governments to discuss and plan for difficult, complex, regional issues. The success of your approach in recent years, in no small way, can be attributed to the recognition by SCAG of the land use authority of cities and counties within the region and of local home rule. We need to ensure that the RTP/SCS and PEIR reflect that basic understanding.

Specifically, our comments are:

1. We understand and have supported SCAG's efforts to incorporate city growth plans into the regional planning process. However, as in the past, we believe that the RTP/SCS growth forecasts

should be adopted at the county level, not the city or sub-city (TAZ) level. This would allow more flexibility in dealing with inevitable changes in socio/economic trends within the region and sub-region.

2. We have questions regarding the use of TAZ level data in the CEQA Incentive program discussed on page 148. We are not convinced that the land use scenarios and development types created by SCAG for each TAZ are accurate. We also would like to clarify that the only use of TAZ level data to be used by SCAG in the future would be for the CEQA Incentive program and not for growth projections.
3. The draft PEIR is somewhat confusing and problematic. It is our understanding that the mitigation measures were supposed to be designed to be a menu of options available to lead agencies to consider when reviewing and approving local transportation and development projects, but not as mandatory or required. This is critical because specific environmental review of local projects is the appropriate and legal purview of local agencies. The Plan will be implemented over several years and circumstances involved with site specific development will inevitably change over time and must be taken into account by local agencies responsible for carrying out CEQA laws. We recommend that SCAG amend language in the document to specifically and clearly state that the mitigation measures as proposed are intended to assist local agencies in their independent decision making process and are not considered mandatory. We also recommend that the Mitigation Monitoring Program be revised to reduce the burdensome nature of the reporting process.
4. In a separate letter (dated February 13, 2012 from Jerry L. Blum, Planning Director) we requested that two important projects for Ontario be included in the 2012 RTP. These projects were requested via SANBAG and SCAG's consultant previously.

We appreciate your consideration of our comments in the final RTP/SCS and PEIR and look forward to your responses. As always, we commend SCAG for its leadership in these regional activities and the transparent and collaborative manner in which you operate. We share your commitment to a stronger, more cohesive, and prosperous region as expressed in the 2012 RTP/SCS. If you have any questions regarding this matter please contact myself or Jerry L. Blum, Planning Director at 909-395-2199.

Sincerely,



Chris Hughes  
City Manager

- c: City of Ontario City Council  
Otto Kroutil, Development Director  
Jerry Blum, Planning Director  
Louis Abi-Younes, City Engineer  
Jacob Lieb, SCAG



February 14, 2012

Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, CA 90017  
VIA E-MAIL

Re: Comments on Regional Transportation Plan

To Whom It May Concern,

The Pasadena Chamber of Commerce has reviewed the Regional Transportation Plan and appreciates the time, effort, thought and work that went into the document. While we appreciate that a regional approach to traffic management, transportation and goods movement we also want to be sure that plans and implementations are truly regional and economics and impacts to local economies are given due consideration.

For example, we would be very concerned about user-based fee proposals to fund transportation projects. For us, we could not support any program or plan that would put the Pasadena area at a competitive disadvantage economically. Traffic, transportation, goods movement and customers need to be able to access Pasadena as easily, simply and cost-effectively as our neighbors in the region. Plans for programs that will charge vehicle drivers a fee to get to Pasadena should be implemented region-wide, not piecemeal, and certainly not in the San Gabriel Valley first. If, for example, congestion pricing schemes or toll roads are proposed, we would want those implemented region-wide, not in a way that puts our area at a disadvantage economically as increased costs to travel to, through or past Pasadena that do not exist in other places, put Pasadena at a competitive disadvantage compared to those places in the area that would not see those same programs implemented and those additional costs imposed.

Likewise, any program or plan to assess fees to mitigate development impacts need to be approved by the local government and funds generated need to be used by those local governments to reduce impacts in their area and existing local fees should exempt businesses within those jurisdictions from any additional costs.

We are also concerned that an agency with little understanding of the Pasadena economy, our local business community or community needs is proscribing programs, mitigations and measures that may be inappropriate or unworkable in our local jurisdiction. It is certainly prudent for SCAG, through the RTP, to set goals for everything from pollutants in the air to the time it should take to travel between cities in the region, but SCAG should not be determining what programs will achieve those goals, not what local costs will be to achieve them.

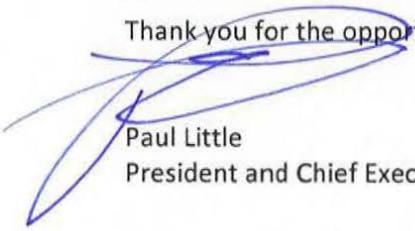
We also appreciate the linking of land use policies with transportation planning, however, we do not see how many local jurisdictions could achieve the goals, especially given the elimination of redevelopment agencies by the State of California. Quite simply, there is no mechanism for localities to support development of any kind, especially not more dense development in our downtowns that would likely require consolidation of properties. How is that to be accomplished when there is no mechanism to capitalize such endeavors?

In fact, we are very concerned that the funding mechanisms identified to finance projects will be very short of anticipated levels, and that some of these mechanisms may never be available as they are not currently implemented in California.

We are also concerned that, while it is important to move goods, vehicles and persons easily through the region, we should be very mindful of impacts to local streets and local economies. Putting in a freeway does no good if the resulting overflow traffic stifles local streets and strangles local business districts.

Finally, the Pasadena Chamber of Commerce cannot stress enough the importance of our local economies. Transportation planning, like every other government endeavor, needs to fully, accurately and appropriately take impacts to the local, regional and state economy into consideration. The best transportation plan imaginable is worthless if it stifles job and economic growth and puts our region, and its cities, at a competitive disadvantage.

Thank you for the opportunity to comment.



Paul Little  
President and Chief Executive Officer

cc: B. Bogaard, M.Beck, F. Dock,

## CENTENNIAL FOUNDERS LLC

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

February 14, 2012

Re: Draft 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS)  
Draft Program Environmental Impact Report (PEIR)

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the draft 2012 RTP/SCS and associated PEIR. We want to recognize the tremendous efforts put forth by you and your staff to create this incredibly complex document while keeping the public informed and welcoming stakeholder input every step of the way.

The application for the proposed sustainable new town of Centennial, located at the intersection of I-5 and SR-138 in North Los Angeles County, was deemed complete by the County of Los Angeles in 2008. The proposed \$9.5 billion direct investment in this region over 20 years will provide 23,000 homes, approximately 27,500 construction jobs and over 30,000 permanent jobs for Los Angeles County. By providing a pedestrian-oriented, sustainable community design with a balance of jobs and housing and the necessary density to support public and community services for the entire region, Centennial will complement the infill, TOD developments being proposed in the urban cores, achieving long-term emissions reductions as mandated by SB 375.

After careful review of the PEIR, we respectfully request that you consider the attached list of technical corrections to various exhibits contained in the RTP/SCS and PEIR. Please note that these exhibit corrections have already been conveyed to Jacob Lieb, Manager of Environmental Planning, in person. Should you have any questions or require further clarification, please do not hesitate to contact me.

Sincerely,

Centennial Founders LLC

  
Carlene Matchniff  
Vice President Entitlements

cc: Robert A. Stine, CEO and Kathleen J. Perkinson, Senior VP – Tejon Ranch Company

## CENTENNIAL FOUNDERS LLC

### SCAG RTP/SCS and PEIR corrections – TAZs 20280.100, and 20281.100, County of Los Angeles

- 1) RTP/SCS Exhibit 4.13, Land Use Pattern Map SCAG Region 2035, correct Growth Pattern shading to reflect Centennial
- 2) RTP/SCS Exhibit 4.15 Land Use Pattern Los Angeles County 2035, correct Growth Pattern shading to reflect Centennial
- 3) PEIR Exhibit 2.18, Project Description, Land Use Pattern in L.A. County, correct Growth Pattern shading to reflect Centennial
- 4) PEIR Exhibit 3.3-5, Special Status Natural Communities in the SCAG Region, correct Terr. Comm. (specific) vegetation category for Centennial to grassland community and should not go into Kern County as not in RTP/SCS
- 5) PEIR Exhibit 3.8-1, Regional Distribution of Important Farmlands and Grazing Lands; need to clarify the difference in similar colors on the legend. Centennial is Grazing Land and should be reflected as such. Recommend the map distinguish the colors on the legend for Grazing Lands and Non-irrigated Farmlands as they are difficult to distinguish as currently presented
- 6) PEIR Exhibit 3.8-9, Household Density by Census Tract, correct to correspond to the household TAZs for the area and change exhibit to the 901-1,500 category
- 7) PEIR Exhibit 3.8-10 Employment Density by Census Tract, correct to correspond to the employment TAZs for the area and change exhibit to the 1,001-1,500 category

# A Plan to Efficiently and Conveniently Unbundle Car Parking Costs

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## ABSTRACT

The *Introduction* shows documented driving reductions due to the pricing of parking. It notes that although the benefits of priced and shared parking are known, such parking has not been widely implemented, due to various concerns. It states that a solution, called “*Intelligent Parking*,” will overcome some of these concerns, because it is easy to use and naturally transparent. It asserts that this description will support a “Request for Proposal” (RFP) process. Eight background information items are provided, including how priced parking would help California achieve greenhouse gas reduction targets. A story demonstrates some of the key features of *Intelligent Parking*. Arguments for less parking, shared parking, and priced parking are made. Barriers to progress are identified. The fair pricing of parking is described. New ways to characterize transportation demand management are presented. Seven goals of *Intelligent Parking* are listed. Eleven definitions and concepts, that together define *Intelligent Parking*, are described. This includes a method to compute a baseline price of parking and how to adjust that price instantaneously to keep the vacancy above 15% (“Congestion Pricing”). An implementation strategy is described.

## INTRODUCTION:

It has been well established that appropriately priced parking will significantly reduce driving<sup>1</sup>. Most case studies presented in Table 1 are evaluations of the most general type of “car-parking cash-out”: *a program that pays employees extra money each time they get to work without driving*. They show that a price differential between using parking and not using parking will significantly reduce driving, even when transit is described as poor. Since driving *must* be reduced<sup>2</sup>, the pricing of parking is desirable.

Shared parking is also recognized as desirable because it can sometimes result in less parking being needed.

Although the advantages of pricing and sharing parking have been recognized for many years, these practices are still rare. This paper identifies some of the reasons for this lack of progress. The pricing and sharing method of this paper has a natural transparency and ease of use that would reduce many of the concerns. This paper also suggests that those governments that have the necessary resources can take the lead role in developing and implementing the described systems. These governments will recover their investments, over time.

This paper describes how parking facilities could be tied together and operated in an optimum system, named *Intelligent Parking*. The description of *Intelligent Parking* is sufficient to support a “Request for Proposal” process, leading to full implementation.

There are two distinct parts to *Intelligent Parking*. The first is how to set the price. The second is how to distribute the earnings. Briefly, the earnings go to the individuals in the group for whom the parking is built.

**Table 1      Eleven Cases of Pricing Impact on Parking Demand**

<b>Location</b>	<b>Number of Workers @ Number of Firms</b>	<b>1995 \$'s Per Mo.</b>	<b>Parking Use Decrease</b>
<b><i>Group A: Areas with poor public transportation</i></b>			
West Los Angeles	3500 @ 100+	\$81	15%
Cornell University, Ithaca, NY	9000 Faculty & Staff	\$34	26%
San Fernando Valley, Los Angeles	850 @ 1	\$37	30%
Costa Mesa, CA	Not Shown	\$37	22%
<b>Average for Group</b>		<b>\$47</b>	<b>23%</b>
<b><i>Group B: Areas with fair public transportation</i></b>			
Los Angeles Civic Center	10,000+ @ "Several"	\$125	36%
Mid-Wilshire Blvd, Los Angeles	1 "Mid-Size" Firm	\$89	38%
Washington DC Suburbs	5,500 @ 3	\$68	26%
Downtown Los Angeles	5,000 @ 118	\$126	25%
<b>Average for Group</b>		<b>\$102</b>	<b>31%</b>
<b><i>Group C: Areas with good public transportation</i></b>			
U. of Washington, Seattle, WA	50,000 employees, students	\$18	24%
Downtown Ottawa, Canada	3,500 government staff	\$72	18%
Bellevue, WA	430 @ 1	\$54	39%*
<b>Average for Group, except Bellevue, WA Case*</b>		<b>\$45</b>	<b>21%</b>
<b>Overall Average, Excluding Bellevue, WA Case*</b>			<b>25%</b>

\* Bellevue, WA case was not used in the averages because its walk/bike facilities also improved and those improvements could have caused part of the decrease in driving.

## **PERTINENT BACKGROUND INFORMATION**

- Vehicle miles traveled (VMT) are a major cause of global warming and pollution<sup>2,3</sup>.
- California's Metropolitan Planning Organizations (MPOs) will need to adopt strategies that reduce vehicle miles traveled (VMT), in order to meet SB375 GHG reduction targets, to be issued by the California Air Resources Board in late 2010, for years 2020 and 2035<sup>2</sup>.
- The appropriate pricing of parking is one of the least costly documented tools to reduce VMT.
- New technologies, such as sensors feeding computer-generated billing, offer the potential to efficiently bill drivers for parking and alert law enforcement of trespassers.
- Reformed parking policies can increase fairness, so that, for example, people who use transit or walk do not have to pay higher prices or suffer reduced wages, due to parking.

- Methods to unbundle parking cost are inefficient unless they support the spontaneous sharing of parking spaces. Shared parking with unbundled cost would ultimately allow cities to require significantly less parking.
- Typical systems of timed parking and metered parking are far from ideal. Parking has no automated record keeping, so it is difficult to know where there is too much or too little.
- Good policies will eventually let cities turn parking minimums into parking maximums.

## **A GLIMPSE INTO A POSSIBLE FUTURE**

Jason is driving to work for the first time in several years. He has decided to save money by carrying home a new 3-D, big-screen computer, which he plans to purchase at a store near his office after work. He wanted to avoid paying delivery charges.

Things have been changing around his office development since they unbundled the cost of parking at the near-by train station. Many people who caught the early trains and lived close to the station stopped driving and parking in the best parking spaces; demand for housing close to the station went up; and wealthy riders, who insisted on driving, did so, confident that they could always find parking as close to the platform as their schedules required, due to congestion pricing. Who would have guessed how much those people were willing to pay? It was shocking. Parking-lot earnings, paid to round-trip train riders, meant that the net cost to ride the train went significantly down. Ridership and neighborhood vitality both went significantly up. All Jason knew was that the price to park at his office had been going up yearly because of increased land values. His parking-lot earnings from his office had been increasing almost every month, due to the ripple effect of train riders parking off-site at cheaper parking. Some of them were using his office parking.

As he pulls out of his driveway, he tells his GPS navigation unit his work hours (it already knew his office location), the location of the store where he plans to buy the computer, and his estimated arrival and departure times at the store. He tells the GPS unit he wants to park once, park no more than 1 block from the store, walk no more than 1 mile total, and pay no more than an average of \$2 per hour to park. He is not surprised to hear the GPS tell him that his request is impossible. He tells the GPS he will pay an average of \$3 per hour and learns that the GPS has located parking.

It guides him into a church parking lot. He hopes the church will use his money wisely. The GPS tells him the location of a bus stop he could use to get to work and the bus's next arrival time at the stop. With automatic passenger identification and billing, the bus has become easy to use, except that it is often crowded. Jason gets out of the car and walks to work, with no action required regarding the parking.

Three weeks later, when Jason gets his monthly statement for his charges and income for automotive road use, transit use, parking charges, and parking earnings, he finds that the day's parking did indeed cost about \$30 for the 10 total hours that he parked. He notes that the parking-lot earnings for his office parking averaged about \$10 per day that month. He then notices the parking lot earnings from the store, where he spent about \$1000 dollars. He sees that the parking-lot earnings percent for the store that month was 1.7%, giving him about \$17. So for the day, Jason only spent a net of about \$3 on parking. Then he realized that he should have had the computer delivered after all. If he would have bicycled that day, as he usually did, he would have still gotten the \$27 earnings from the two parking facilities and he would have paid nothing

for parking. So the choice to drive cost him \$30. He remembers that the delivery would have only been \$25 dollars. Oh well. He enjoyed his before-work and after-work walks.

## **THE CASE FOR LESS PARKING**

Less parking will support more compact development.<sup>1</sup> This makes walking and biking more enjoyable and less time consuming. There would certainly be less “dead space”, which is how parking lots feel to people, whether they arrive by car or not, after they become pedestrians.

Since parking can be expensive, less parking can reduce overhead costs significantly, such as leasing expense and parking-lot maintenance cost. Less overhead means more profit and less expense for everyone. A need for less parking can create redevelopment opportunities at existing developments and reduce project cost at new developments.

At new developments, car-parking costs could prevent a project from getting built.<sup>2</sup>

## **THE CASE FOR SHARED PARKING**

Shared parking for mixed uses means that less parking is needed. For example, shared parking could be used mostly by employees during the day and mostly by residents at night.

Fully shared parking means that very little parking would be off limits to anyone. In a central business district with shared parking, drivers would be more likely to park one time per visit, even when going to several locations. Pedestrian activity adds vitality to any area.

## **THE CASE FOR APPROPRIATELY-PRICED PARKING**

### **To Reduce Driving Relative to Zero Pricing**

#### ***Traditional Charging or Paying Cash-out Payments***

As shown in the Introduction, this relationship (pricing parking reduces driving) is not new.<sup>3</sup>

Using results like Table 1, at least one study<sup>4</sup> has used an assumption of widespread pricing to show how driving reductions could help meet greenhouse gas (GHG) target reductions. Dr. Silva Send of EPIC <http://www.sandiego.edu/epic/ghgpolicy/> assumes that all work locations with 100 employees or more in San Diego County will implement cash-out, to result in 12% less driving to work. Currently, almost all employees in San Diego County “park for free”, unless they happen to work in a downtown core area.

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<sup>1</sup> This is especially true of surface parking, which only accommodates 120 cars per acre.

<sup>2</sup> On September 23, 2008, a panel of developers reviewed the Oceanside, Ca. “Coast Highway Vision” [http://www.ci.oceanside.ca.us/pdf/chv\\_finalvisionstrategicplan.pdf](http://www.ci.oceanside.ca.us/pdf/chv_finalvisionstrategicplan.pdf). Parts of this plan were described as smart growth.

At the review, developer Tom Wiegel said, “Parking is the number 1 reason to do nothing,” where “do nothing” meant “build no project.” The other developers at the meeting agreed.

<sup>3</sup> For many years the Victoria Transport Policy Institute (VTPI) has been recognized as a source of reliable information on “Transportation Demand Management”, or TDM.

From [http://www.vtpi.org/tdm/tdm72.htm#\\_Price\\_Parking](http://www.vtpi.org/tdm/tdm72.htm#_Price_Parking):

Even a relatively small parking fee can cause significant travel impacts and provide significant TDM benefits. “TDM Benefits” refers to the many public and private benefits of having fewer people choosing to drive.

### ***Current, Best-Practice “Unbundling”***

The “best-practice” use of the phrase, “unbundled parking cost”, is to describe the case where either the cost of parking, for the case of a condominium, or the rent for parking, for the case of an apartment, is separated from either the purchase price and common fees or the rent of the dwelling unit.

This gives the resident families the choice of selecting the number of parking spaces they would like to rent or buy, including the choice of zero. This would tend to reduce the average number of cars owned per dwelling unit and, in this way, would also tend to reduce driving. Its major drawback is that this method does not encourage sharing.

### **To Increase Fairness and Protect the US Economy**

It is stated above that almost all employees in San Diego County “park for free”. Of course there is really no such thing as “parking for free”. So-called “free parking” always reduces wages or increases costs. At a work site, it reduces everyone’s wage, even those employees that never drive. At an apartment complex, so-called “free parking” increases the rent. Therefore, “free parking” at work or at apartments violates the fundamental rule of the free market, which is that people should pay for what they use and not be forced to pay for what they do not use. Parking should at least be priced to achieve fairness to non-drivers.

The US economy would also benefit. Reductions in driving would lead to reductions in oil imports, which would reduce the US trade deficit.<sup>4</sup>

### **BARRIERS TO PROGRESS**

Given all this, it might seem that the widespread pricing of parking should have happened by now. However there are barriers. In 2007, a majority of the City Council of Cupertino, Ca. indicated that they wanted their City Manger to negotiate reduced parking requirements with any company that would agree to pay sufficient cash-out payments. To this date, no company, including Apple Inc., has expressed an interest. Most companies probably perceive cash-out as expensive. Even if they realize they could get a reduced parking requirement in exchange for paying sufficient cash-out amounts and even if the economics worked in support of this action (quite possible where land is expensive), they want to stay focused on their core business, instead of getting involved in new approaches to parking, real estate, and redevelopment.

On the other hand, simply charging for parking and then giving all the employees a pay raise is probably going to run into opposition from the employees, who will feel that they would be losing a useful benefit.

In addition, neighbors fear the intrusion of parked cars on their streets. Permit parking, which could offer protection, is not always embraced. City Council members know that a sizable fraction of voting citizens believe that there can actually never be too much “free parking”,

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<sup>4</sup> From [http://en.wikipedia.org/wiki/Balance\\_of\\_trade#Warren\\_Buffett\\_on\\_trade\\_deficits](http://en.wikipedia.org/wiki/Balance_of_trade#Warren_Buffett_on_trade_deficits), Warren Buffet wrote in 2006,

“The U.S. trade deficit is a bigger threat to the domestic economy than either the federal budget deficit or consumer debt and could lead to political turmoil. Right now, the rest of the world owns \$3 trillion more of us than we own of them.”

Professor Shoup's famous book<sup>5</sup> notwithstanding. Some Council members probably feel that way themselves.

It doesn't help that current methods of charging for downtown parking are often very inefficient.<sup>5</sup> For example, downtown Oceanside, California has parking meters that will only accept coins. Besides this, all their on-street, downtown parking is timed, with maximums from 10 minutes to 4 hours. These time limits are enforced by a city employee, who applies chalk from a tire to the street and then records the time. However, by watching the time and moving their car soon enough, drivers can avoid getting a ticket. Of course, they could instead drive to the mall and not have to worry about having coins or elapsed time since parking. It is not surprising that downtown merchants often object to charging for parking.

In summary, those that resist charging for parking, *based on their perceptions*, include

- Companies, *who fear the complexity and expense of paying cash-out payments*;
- Employees, *who fear of losing a current benefit*;
- City leaders, *who fear the political repercussions*;
- Downtown patrons, *who dislike the inconvenience and worry*;
- Downtown business owners, *who fear that it will drive away customers*.

## **THE COST, VALUE, AND FAIR PRICE OF PARKING**

### **Estimated and Actual Capital Cost**

#### ***Surface Parking***

One acre of surface parking will accommodate 120 cars. Land zoned for mixed use is sometimes expensive. At \$1.2 million per acre, the land for a single parking space costs \$10,000.

Construction cost should be added to this to get the actual, as-built cost of each parking space. Estimated cost can be determined by using appraised land value and construction estimates. For new developments, after the parking is constructed, it is important to note the actual, as-built cost.

#### ***Parking-Garage Parking***

One acre of parking-garage will accommodate considerably more than 120 cars. The construction cost of the garage and the value of its land can be added together to get the total cost. Dividing that total cost by the number of parking spaces yields the total, as-built cost of each parking space. Adding levels to a parking garage may seem like a way to cut the cost of each parking space, for the case of expensive land. However, there is a limit to the usefulness of this strategy because the taller the parking garage, the more massive the supporting structural members must be on the lower levels, which increases total cost. Parking-garage parking spaces are often said to cost between \$20,000 and \$40,000. The actual costs should be noted.

#### ***Underground Parking***

In order to compute an estimate for the cost of a parking space that is under a building, it is necessary to get an estimate of the building cost with and without the underground parking. The difference, divided by the number of parking spaces, yields the cost of each parking space. The

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<sup>5</sup> According to Bern Grush, Chief Scientist of Skymeter Corporation <http://www.skymetercorp.com/cms/index.php>, often two-thirds of the money collected from parking meters is used for collection and enforcement costs.

cost or value of land plays no role in the cost of this parking. However, it does not follow that this parking is cheap. Underground parking spaces are often said to cost between \$60,000 and \$90,000 dollars each. Although there will be an “as built” cost of the building with the parking, there will never be an “as built” cost of the building without the parking. However, after the construction is done, the estimate for the cost of the underground parking should be reconsidered and re-estimated if that is needed. The final, best-estimate cost should be noted.

## **Value**

Initially, value and cost are the same. For surface parking and parking-garage parking, the value would initially be the same as the as-built cost. For underground parking, the value would initially be the same as the best-estimate cost. However, over time, the value must be updated. Both construction costs and land-value costs will change. The value assigned to a parking place should always be based on the current conditions.

## **Fair Pricing**

Parking space “values”, as described above, must first be converted to a yearly price by using a reasonable conversion factor. This conversion factor could be based on either the “cost of money” or the “earnings potential of money”. It is expected that this conversion factor would be 2% to 5% during times of low interest rates and slow growth; but could be over 10% during times of high-interest and high growth. For example, if the surface parking value is \$12,000 and it is agreed upon to use 5% as the conversion factor, then each parking spot should generate \$600 per year, just to cover capital costs. The amount needed for operations, collection, maintenance, depreciation, and any special applicable tax is then added to the amount that covers capital cost. This sum is the amount that needs to be generated in a year, by the parking space.

The yearly amount of money to cover capital cost needs to be re-calculated every year or so, since both the value and the conversion factor will, in general, change each year. The cost of operations, collection, maintenance, depreciation, and any special applicable tax will also need to be reconsidered.

Once the amount generated per year is known, the base price, per unit year, can be computed by dividing it (the amount generated per year) by the estimated fraction of time that the space will be occupied, over a year. For example, if a parking space needs to generate \$900 per year but it will only be occupied 50% of the time, the time rate charge is \$1800 per year. This charge rate per year can then be converted to an hourly or even a per-minute rate. The estimated fraction of time that the parking is occupied over a year will need to be reconsidered at least yearly.

## **NEW DEFINITIONS TO PROMOTE AN OBJECTIVE VIEW OF PRICING**

- The “fair price” means the price that accounts for all costs.
- The “baseline amount of driving” means the driving that results from the application of the fair price.
- “Zero transportation demand management” (“zero TDM”) is the amount of demand management that results when the fair price is used. It will result in the baseline amount of driving.
- “Negative TDM” refers to the case where the price is set below the fair price. This will cause driving to exceed the baseline amount. Since TDM is commonly thought to be an action that reduces driving, it follows that negative TDM would have the opposite effect.
- “Positive TDM” refers to the case where the price is set above the fair price. This would cause the amount of driving to fall below the baseline amount.

Clearly, so-called “free parking” is an extreme case of negative TDM. The only way to further encourage driving would be to have a system that pays a driver for the time their car is parked.

## **THE GOALS OF *INTELLIGENT PARKING***

- There is only one agency operating all parking. (“All parking” does not include driveways and garages in single-family homes.) *Intelligent Parking* is designed and installed by regional or state government, using low-bid contractors, with design and start-up costs covered by the overhead portion of collection fees.
- Nearly all parking is shared. Almost always, anyone can park anywhere. Those who want exclusive rights to parking will pay “24/7” (all day, every day).
- Parking is operated so that the potential users of parking will escape the expense of parking by choosing to not use the parking. This characteristic is named “unbundled” because the cost of parking is effectively unbundled from other costs.
- Parking is priced and marketed to eliminate the need to drive around looking for parking.
- Parking at any desired price is made as easy as possible to find and use.
- Records of the use of each parking space are kept, to facilitate decisions to either add or subtract parking spaces.
- The special needs of disabled drivers, the privacy of all drivers, and, if desired, the economic interests of low-income drivers are protected.

## **DEFINITIONS & CONCEPTS OF *INTELLIGENT PARKING***

### **Parking Beneficiary Groups**

There are at least 7 types of beneficiary groups. Note that in all cases, members of beneficiary groups must be old enough to drive.

- 1.) People who have already paid for the capital cost of parking. An example of this type of beneficiary group would be the owners of condominiums, where parking has been built and the cost is included in the price of the condominium. Note that although they have technically already paid for the parking, if they borrowed money to pay for some portion of the price, the cost is built into their monthly payment. This illustrates why the value of parking and the cost of borrowing money (rate of return on money) are key input variables to use to compute the appropriate base, hourly charge for parking.
- 2.) People who are incurring on-going costs of parking. An example of this type of beneficiary group is a set of office workers, where the cost of „their” parking is contained in either the building lease or the cost of the building. Either way, the parking costs are reducing the wages that can be paid to these employees.<sup>6</sup>
- 3.) People who are purchasing or renting something where the cost of the parking is included in the price. Examples of this beneficiary group are people that rent hotel rooms, rent an apartment, buy items, or dine in establishments that have parking.

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<sup>6</sup> Such parking is often said to be “for the benefit of the employees”. Defining this beneficiary group will tend to make this statement true, as opposed to the common situation where the employees benefit only in proportion to their use of the parking.

- 4.) People who own off-street parking as a business. They could be the individual investors or could be a government or government-formed entity.
- 5.) People who are said to benefit from parking, even though the money for the parking has been supplied by a source that may have very little relationship to those that are said to benefit. An example of this group would be train riders that make round trips from a station which has parking that is said to be “for riders”. Students at a school with parking would be another example.
- 6.) People who are considered by many to be the logical beneficiaries of on-street parking. Owners of single-family homes are the beneficiaries of the parking that is along the boundaries of their property. The same status is given to residents of multi-family housing.
- 7.) Governments. Since they build and maintain the streets, they should get a significant benefit from on-street parking.

### **Unbundled Cost and Spontaneous Sharing**

“Unbundled cost” means those who use the parking can see exactly what it costs and those who don’t use the parking will either avoid its cost entirely or will get earnings to make up for the hidden parking cost they had to pay. This conforms to the usual rule of the free market where a person only pays for what they choose to use. Unbundled cost is fair.

“Spontaneous sharing” means that anyone can park anywhere at any time and for any length of time. Proper pricing makes this feasible.

#### ***How to Unbundle***

The method of unbundling can be simply stated, using the concept of “beneficiary group” as discussed above. First, the fair price for the parking is charged. The resulting earnings<sup>7</sup> amount is given to the members of the beneficiary group in a manner that is fair to each member. Methods are described below.

#### ***Why this Supports Sharing***

Members of a beneficiary group benefit financially when “their” parking is used. They will appreciate users increasing their earnings. They are also not obligated to park in “their” parking. If there is less-expensive parking within a reasonable distance, they might park there, to save money. This is fine, because all parking is included in the *Intelligent Parking* system.

#### ***Computing the Earnings for Individuals***

*Intelligent Parking* must be rigorous in paying out earnings<sup>7</sup>. For a mixed use, the total number of parking spaces must first be allocated to the various beneficiary groups. For example in an office/housing complex, 63.5% of the parking might have been sold with the office. If so, the housing portion must be paying for the other 36.5%. For this case, it would follow that the first step is to allocate 63.5% of the earnings to the workers and 36.5% to the residents.

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<sup>7</sup> The earnings amount is the revenue collected minus the collection cost and any other costs that will have to be paid due to the implementation of *Intelligent Parking*. The costs associated with the parking, paid *before* the implementation of *Intelligent Parking*, should *not* be subtracted from the revenue because they will continue to be paid as they were before the implementation of *Intelligent Parking*. Therefore, these costs will continue to reduce wages and increase the prices of goods and services.

How the monthly earnings are divided up among the members of the beneficiary group depends on the beneficiary group type. For each member, the group's total monthly earnings amount is always multiplied by a quantity and divided by the sum (the sum is the denominator) of that quantity, for all members.

For example, for each employee, the multiplier is the number of hours that the employee worked over the month while the denominator is the total number of hours worked by all employees over the month. At a school, for each student, the numerator is the total time spent at the school, over the month, while the denominator is the sum of the same quantity, for all the students.

For a train station with parking being supplied for passengers that ride on round trips of one day or less, the numerator is the passenger's monthly hours spent on such round trips, over the month; while the denominator is the total number of hours spent by all passengers on such round trips, over the month. Radio Frequency Identification (RFID) units on passengers could support an automated calculation of monthly charges for fares, as well as monthly hours on round trips.

At a shopping center, the numerator is the sum of the money spent by the shopper, over the month, while the denominator is the total amount of money spent by all shoppers over the month.

At a condominium, the numerator is the number of parking places that were paid for (directly or indirectly) by the resident family and the denominator is the total number of parking places at the condominium project; similarly, for apartment complexes.

### ***Where Earnings Are Low***

The goal is that if someone doesn't park, they don't pay, either directly or indirectly, because the earnings that they get will balance out their losses (like reduced wages, for example). However, charging for parking that few want to use will not sufficiently compensate the people that have been forced, or are being forced, to pay for such parking. The only remedy in this case is to redevelop the parking or lease the parking in some other way, for storage, for example. The earnings from the new use should go to those that are in the beneficiary group that was associated with the low-performing parking.

### ***Why This Method of Unbundling Will Feel Familiar to Leaders***

Developers will still be required to provide parking and will still pass this cost on, as has been discussed. There will be no need to force an owner of an exiting office with parking to break his single business into two separate businesses (office and parking).

Parking beneficiaries are identified that conform to traditional ideas about who should benefit from parking.<sup>8</sup>

### ***Unbundling the Cost of On-Street Parking***

The revenue from on-street parking in front of businesses will be split evenly between the city and the business's parking beneficiaries. All of the earnings from on-street parking in front of apartments or single-family homes will be given to the resident families.<sup>9</sup>

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<sup>8</sup> Showing exactly where parking earnings go will reduce the political difficulties of adopting pay parking in a democracy where the high cost of parking is often hidden and rarely discussed.

<sup>9</sup> Although governments own the streets, often, back in history, developers paid for them and this cost became embedded in property values. Admittedly, how to allocate on-street parking earnings is somewhat arbitrary. With

### ***Special Considerations for Condominiums***

Unbundling for a condominium owner means that, although their allocated amount of parking has added to their initial cost, their allocated amount of parking also earns money for them. Unbundling for a condominium could also mean that an owner can choose to have control over a single or several parking places. Such parking spaces could be equipped with a red light and a green light. If the red light is lit, this will mean that the space is not available for parking, except for the person who is controlling the spot. If the green light is lit, it will mean that the space is available to anyone. A space that is being reserved with a red light is charged at the full price to the condominium owner that has control over the space. The owner that controls these spaces can change the state of the parking space (available or not available) by either a phone call, on line, or at any pay station system that might be in use for the system. After condominium owners experience the cost of reserving a space for themselves, they might give up on the idea of having their own, personal, unshared parking space; especially since *Intelligent Parking* will give most owners and their guests all the flexibility they need in terms of parking their cars.

Some people think that condominium parking should be gated, for security reasons. However, parking within parking garages needs to be patrolled at the same frequency level as on-street parking, which is enough to ensure that crime around either type of parking is very rare. Cameras can help make parking garages that are open to the public safe from criminal activity.

### ***Special Considerations for Renters***

Unbundling for renters means that, although their allocated amount of parking increases their rent, their allocated amount of parking also earns money for them. Therefore, their traditional rent (includes parking) is effectively reduced by the money earned by those parking spaces allocated to them. Renters will be motivated to either not own a car or to park in a cheaper location. Parking in a cheaper location is not a problem because all parking is part of the *Intelligent Parking* system. Renters will welcome anyone to park in “their” parking, because it will increase their earnings.

### ***Special Considerations for Employers***

At first, companies may want the option of offering “free parking” to their employees so as to be able to compete with traditional job sites. This means giving employees that drive every single day an “add-in” amount of pay so that the sum of the add-in and their parking-lot earnings equals their charge, for any given monthly statement. The operator of the parking, which sends out statements, can pay out the “add in” amount, in accordance with the company’s instruction. The company will then be billed for these amounts. There could be no requirement for the company to provide any such “add-in” amount to the employees that don’t drive every day. This would allow the company to treat its every-day drivers better than other employees and so this would be a negative TDM. However, this economic discrimination would be substantially less than the current, status-quo, economic discrimination, where drivers get “free” parking and non-drivers get nothing.

## **Clusters of Parking**

Clusters are a contiguous set of parking spaces that are nearly equal in desirability and thus can be assigned the same price. They should probably consist of from 20 to 40 spaces. For off-street

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congestion pricing and efficient methods, governments may earn significantly more than they are under current practices.

parking, they could be on either side of the access lane to the parking spaces, so that an observer could see the 20 to 40 cars, and get a feel for the vacancy rate. At a train station, clusters will normally be organized so that their parking spaces are approximately an equal distance from the boarding area. On-street clusters would normally conform to our current understanding of what a block is, which is to say from one cross street to the next cross street. The width of the street and the length of the block should be taken into account in defining on-street clusters of parking and in deciding if the parking on either side of the street should or should not be in the same cluster of parking spaces.

## **Examples of Good and Bad Technology**

### ***Parking Meters or Pay Stations***

Parking meters are a relic of an earlier period, before computers. Pay stations do not add enough usefulness to merit their inclusion in *Intelligent Parking*, except as a bridge technology. Once good systems are set up, pay stations should cost additional money to use because of their expense. It would be best to devise an implementation strategy that will minimize their use when the system is first put into effect and will take them out of service as soon as possible.

### ***Radio Frequency Identification Backed Up by Video-Based “Car Present” and License Recognition***

Government will eventually enter into an RFID (Radio Frequency Identification) age. Organizers of large athletic events already have. Organizers that put on large open-water swims, foot races, and bike rides have routinely used RFID for many years.<sup>10</sup> An RFID vendor in San Diego<sup>11</sup> states that passive RFID units cost less than \$5, are reliable, are durable, and they could be used to identify cars as well as people. He also sees no problem in implementing most of the features of *Intelligent Parking*.<sup>12</sup>

### ***Automatic Data Collection and Sending Out Statements***

Note that the “back end database” of Dr. Carta’s written statement<sup>12</sup> refers to the ability to send statements of earnings and billing to students.<sup>13</sup>

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<sup>10</sup> For example, over 20,000 people ran the 2008 Bay-to-Breakers foot race in San Francisco. Each runner had a “chip” in their shoe lace. Each runner’s start time and finish time were recorded and all results were available as soon as the last runner crossed the finish line.

<sup>11</sup>David R. Carta, PhD, CEO Telaeris Inc., 858-449-3454

<sup>12</sup> Concerning a Final Environmental Impact Report-approved and funded new high school in Carlsbad, California, where the School Board has signed a *Settlement Agreement* to consider “*unbundled parking*”, “*cash-out*”, and “*pricing*”, Dr. Carta wrote, in a January 13<sup>th</sup>, 2010 written statement to the Board,

I wanted to send a quick note discussing the technical feasibility of tracking cars into a lot without impacting students or requiring the need for gates. Mike Bullock and I have discussed this project; it can be accomplished straightforwardly by utilizing Radio Frequency Identification and/or Video Cameras integrated with automated license recognition systems. The cars would need to register with the system at the start, but it would be fairly painless for the users after the initial installation. The back end database system can also be implemented both straightforwardly and at a reasonable price.

This is not necessarily a recommendation of the proposal for unbundled parking. Rather it is strictly an unbiased view of the technical feasibility of the proposal to easily and unobtrusively track cars, both registered and unregistered, into a fixed lot.

<sup>13</sup> In an earlier email on this subject, Dr. Carta wrote,

## ***Putting it Together***

Certainly, government, and in particular transit agencies and parking agencies, could use RFID-based technology. For example, when a person with an RFID unit which is tied to a billable address or a credit card with an open account gets on a bus or a train, they should not have to pay at that time, visit a pay station, or “swipe a card” that has a positive balance. Utility customers that pay their bills are not required to pre-pay. The same courtesy should be extended to transit riders, people that drive on roads, people that get parking-lot earnings, and people that park cars. There should be one monthly bill or statement, for all four activities.

## ***Global Positioning Systems GPS***

An alternative model is to have GPS systems in cars that would detect the car’s parking location, that location’s current charge rate, and would perform all of the charging functions in the car. The only information the parking-lot-enforcement system would need is whether or not a car being parked is owned by a bill-paying owner. The car owner’s responsibility would be to pay the bills indicated by the box in the car. The box would need to process a signal that a bill had been paid. It would also need to process pricing signals.

## ***Not Picking Winners***

The purpose of this report is to describe what an ideal system would do, *not* how it is done. How a proposed system works is left to the systems, software, and hardware engineers that work together to submit a proposal based on this description of what an ideal system does.

## **Privacy**

Privacy means that no one can see where someone has parked, without a search warrant. Also, the level of the detail of information that appears on a bill is selected by the customer.<sup>14</sup>

## **Ease of Use for Drivers**

For credit-worthy drivers that have followed the rules of the system, pay parking will not require any actions other than parking. Paying for all parking fees over a month is then done in response to a monthly billing statement. Parking will feel to the consumer like a service provided by a municipality, such as water, energy, or garbage. One important difference is that users belonging to a “beneficiary group” will get an earnings amount in their monthly statement. Those that earn more than what they are charged will receive a check for the difference. This ease of use will make all parking less stressful.

## **Base Price**

### ***Off-Street***

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This is not too tough - we probably would integrate with a service that already sends physical mail from an electronic submission instead of re-inventing this wheel.

<sup>14</sup> License plates that have no RFID tags fail to use the best technology to accomplish the primary purpose of license plates, which is to identify and help intercept cars used in a crime. Identifying cars is a legitimate government goal. Protecting privacy is also a legitimate goal. Both goals can be realized with good laws, good enforcement, and good systems engineering.

Off-street parking is priced so that even if demand does not threaten to fill the parking beyond 85%, the money generated will at least equate to an agreed-upon return on the parking value and pay all yearly costs. Equation 1 shows the calculation of the hourly rate.

$$r_{BaselineHourly} = \frac{(r_{Investment} \times v_{Parking}) + c_{YOPD}}{(n_{HoursPerYear} \times f_{TO})} \quad \text{(Eq. 1)}$$

where:

$r_{BaselineHourly}$	=	the computed baseline hourly rate to park
$r_{Investment}$	=	yearly return on investment, such as .06
$v_{Parking}$	=	value of a parking space, such as (parking garage) \$40,000
$c_{YOPD}$	=	yearly operations <sup>15</sup> plus depreciation, per space, such as \$100
$n_{HoursPerYear}$	=	number of hours per year, 24 x 365 = 8760 Hours per Year
$f_{TO}$	=	fraction of time occupied, such as 0.55.

For the example values given, the base hourly rate of parking, to cover the cost of the investment, operations<sup>15</sup>, and depreciation is \$0.519 per hour. This could be rounded up to \$0.52 per hour. This price could also be increased to result in positive TDM, to reduce driving more than the fair-price, zero-TDM amount.

### ***On-Street***

If on-street parking is located within walking distance (one-quarter mile) of off-street parking, its base price is set equal to the closest off-street parking's base price. Otherwise, it is set to some agreed-upon value, like fifty cents per hour. However, on-street parking has a special meaning for downtown merchants and for neighborhoods, two powerful political forces in any city. Merchants that have few cars parking on their street, even though it is permitted, are probably failing in their businesses. They would like free parking to help draw visitors to their store front. Neighborhoods that are not impacted by parking would probably prefer no pricing. For these reasons, for any on-street parking cluster, no price is charged until the cluster occupancy reaches 50%. (Time of day is irrelevant.)

### **Congestion Pricing**

The time-rate price of parking is dynamically set on each cluster of parking, to prevent the occupancy rate from exceeding 85% (to reduce the need to drive around looking for parking). An 85% occupancy rate (15% vacancy) results in just over one vacant parking space per city block<sup>5</sup>. If the vacancy rate is above 30%, the price is left at the baseline hourly rate. If vacancies fall below 30%, the price can be calculated in a stair-step method, such as shown in Table 2.

Equation 2 is an alternative method.

In either case, the total charge is time parked, multiplied by the time-averaged, time-rate price. The base multiplier would be adjusted to be just large enough to keep the vacancy rate from falling below a desired level, such as 15%, so it is always easy to find parking.

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<sup>15</sup> This includes money for policing, cleaning, maintenance, any applicable parking tax, and all collection costs. Collection costs will need to include an amount to recover the development and installation costs of *Intelligent Parking*.

**Table 2 Hourly Rates for 2 Base Multipliers and a Baseline Hourly Rate of \$0.52**

Vacancy Rate	Base Multiplier = 2			Base Multiplier = 2.5		
	Multiplication		Hourly Rate	Multiplication		Hourly Rate
	Formula	Value		Formula	Value	
Above 30%	$2^0$	1	\$0.52	$2.5^0$	1	\$0.52
25% to 30%	$2^1$	2	\$1.04	$2.5^1$	2.5	\$1.30
20% to 25%	$2^2$	4	\$2.08	$2.5^2$	6.25	\$3.25
15% to 20%	$2^3$	8	\$4.16	$2.5^3$	15.625	\$8.13
10% to 15%	$2^4$	16	\$8.32	$2.5^4$	39.0625	\$20.31
5% to 10%	$2^5$	32	\$16.64	$2.5^5$	97.6563	\$50.78
Below 5%	$2^6$	64	\$33.28	$2.5^6$	244.1406	\$126.95

$$r_{HourlyRate} = r_{BaselineHourly} \times (B^{(30-V)/5}), \text{ for } V < 30; r_{BaselineHourly}, \text{ otherwise (Eq. 2)}$$

where:

- $r_{HourlyRate}$  = the congestion-priced hourly rate to park
- $r_{BaselineHourly}$  = the baseline hourly rate to park, such as \$0.52 per hour (taken from from Eq. 1.
- $B$  = the base of the multiplier being computed, such as 2.50
- $V$  = the vacancy rate percent, such as 17.5, for 7 vacancies in a cluster of 40 spaces,  $100*(7/40) = 17.5$

For the example values given, the hourly rate of parking would be \$9.88 per hour.

### Pricing Predictions and Notifications

Drivers will develop strategies for their routine trips. The computer system that keeps records of parking use will also provide help for users. The *Intelligent Parking* website will direct a user to an appropriate cluster of parking if the user provides the destination location or locations, the time and date, and the hourly rate they wish to pay. If the walk is going to be long, the website could suggest using transit to get from the cheaply-priced parking to the destination. In such cases, the website may also suggest using transit for the entire trip.

Another user option is to specify the time, location, and the distance the user is willing to walk. In this case, the computer would give the cheapest cluster of parking available at the specified walk distance. The price prediction would be provided.

All price predictions would also have a probability of correctness associated with them. If a user can show that a computer has predicted a much lower price than what actually occurred, with a sufficiently high probability, it would be reasonable to charge the user the predicted price rather than the actual price.

Websites could routinely inform viewers when occupancy rates are expected to be unusually high, due to a special event (for example, a sporting event). The parking system website will always give current and predicted hourly rates for all locations. The hourly rates of parking will also be available at a phone number and possibly at pay stations. The base-price hourly rate, for any parking cluster, would be stable and could therefore be shown on signs. Parking garage entrances could have large video screens showing both predicted and existing price. Users will also learn to look at parking and judge whether congestion pricing applies, or could apply, while

their car is parked. It would not be long before these capabilities are added into GPS navigation systems.

## **Prepaid RFID**

To be inclusive, pay stations or convenience stores will offer a pre-paid RFID that can be set on the dashboard of a car. This will support drivers with poor credit or drivers who have not obtained the necessary equipment to support the normal, trouble-free methods. This will also work for drivers that do not trust the system to protect their privacy for a certain trip (by removing or disabling the permanent RFID) or for all trips. No billing would occur.

## **Enforcement**

The system would notify the appropriate law enforcement agency if an unauthorized car was parked. Authorized cars would need either a pre-paid RFID or equipment indicating that their owners had *Intelligent Parking* accounts and were sufficiently paid up on their bills.

## **IMPLEMENTATION**

This description of *Intelligent Parking* will help to implement efficient parking systems. Parking at train stations, schools, and government buildings could introduce many of these concepts. This description of *Intelligent Parking* is sufficient to support a “Request for Proposal” process, which could lead to full implementation. Widespread installation should be done by a government agency, to minimize actions required on the part of the private sector. Laws would simply require the cooperation of all private-sector and government entities.

## **SUMMARY**

A parking plan, *Intelligent Parking* has been described.

1. Technology will make it easy to use for most drivers.
2. Its parking is almost always shared, to support mixed uses.
3. It unbundles cost by charging and having earnings go to the parking beneficiaries.
4. Traditional groups, such as single-family home owners, employees, tenants, train riders, and students benefit from parking. The benefit is equal for drivers and non-drivers.
5. Baseline prices are computed primarily from the value of the parking and an agreed-upon rate of return. On-street parking is free until it is half full, at which time its base price often matches that of the closest off-street parking.
6. For all parking, price is dynamically increased to guarantee availability. Earnings are therefore only limited by what people are willing to pay.
7. Technology helps drivers find parking and decide if they want to drive or use transit.
8. Prepaid RFIDs provide service to those who have poor credit or don't want to be billed.
9. Disabled and perhaps low-income drivers will have accounts that allow them to park at reduced prices and perhaps avoid congestion pricing. Specially designated spots might also be required for disabled drivers.
10. The system will provide reports showing where additional parking would be a good investment and where it would be wise to convert existing parking to some other use.

11. Privacy will be protected. Law enforcement officials would need a search warrant to see where someone's car has been parked. The level of detail on billing would be selected by the car's owner.

12. Implementations could begin in carefully selected locations and expand.

Global warming, air pollution, trade deficits, and fairness are some of the significant reasons that governments have a responsibility to implement *Intelligent Parking*.

## ACKNOWLEDGEMENTS

The following people have offered encouragement, specific information, and/or special insights.

Dr. Dennis Martinek, Oceanside Planning Commissioner; Sandra Goldberg, California Deputy Attorney General; Jerry Kern, Oceanside, City Council; Amy Volzke, Principal Planner, City of Oceanside; Dr. Nilmini Silva-Send, Senior Policy Analyst of the Energy Policy Initiative Center; Diane Nygaard, Director of Preserve Calavera and founder of Nelson Nygaard, Consulting Associates; Lisa Rodman, Trustee, Carlsbad Unified School District; Dr. Michael McQuary, President, La Jolla Democratic Club; Joan Bullock; Judy Jones, San Diego County Central Committee, California Democratic Party; Patrick Siegman, Principal and Shareholder, Nelson Nygaard; Andy Hamilton, San Diego Air Pollution Control District; Renee Owens, Conservation Chair, San Diego Sierra Club; Caroline Chase, Executive Committee Chair, San Diego Sierra Club; Ed Mainland, Co-Chair, Energy-Climate Committee, Sierra Club California; Bern Grush, Chief Scientist, Skymeter Corporation; and the following San Diego Area Government (SANDAG) employees: Susan Baldwin, Senior Regional Planner; Bob Leiter, former Director of Land Use and Transportation Planning; Coleen Clementson, Principle Planner; and Stephan Vance, Senior Regional Planner.

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## KEYWORDS

A&WMA, Parking, Unbundled, Shared, TDM, cash-out, pricing, beneficiary, greenhouse gas, GHG, GPS, RFID



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April 20, 2011

SANDAG Board of Directors

Via E-mail: [pjo@sandag.org](mailto:pjo@sandag.org) (Phillip Johnston)

**Re: California Air Resources Board (CARB) Greenhouse Gas (GHG) Reduction Targets, Issued to SANDAG, in Accordance with SB 375, for the Year 2035**

**SANDAG Board Chair Jerome Stocks and Members of the Board:**

I appreciate the opportunity to communicate with you concerning this important topic.

The subject targets were issued on September 30<sup>th</sup> of 2010. On September 20<sup>th</sup>, I sent a letter to CARB<sup>1</sup> asking them to issue targets that would uphold the Executive Order S-3-05<sup>2</sup> GHG reduction trajectory, for cars and light-duty trucks. CARB's Scoping Plan gives no reason to not apply the straight-line trajectory, implied by the S-3-05 reductions, to the GHG emissions from cars and light-duty trucks. S-3-05 names CARB as one of the agencies that must create plans and progress reports to ensure that the reductions in S-3-05 are achieved.

Unfortunately, CARB gave you (SANDAG) the Year 2035 reduction that you (SANDAG) requested, which is only a 13% reduction, for year 2035.

**“GHG” is really “VMT” and Other Important Details on the Reductions**

These reductions are per capita, with respect to *driving* in 2005. This can be understood by carefully considering the following two items:

- 1.) Page 8, of [http://arb.ca.gov/cc/sb375/staffreport\\_sb375080910.pdf](http://arb.ca.gov/cc/sb375/staffreport_sb375080910.pdf), which says, “The RTAC recommended that targets be expressed as a percent reduction in per-capita greenhouse gas emissions from a 2005 base year”; and
- 2.) The first footnote in the table of CARB calculations, <http://arb.ca.gov/cc/sb375/mpo.co2.reduction.calc.pdf>, which says: “The CO2 emissions presented in this table do not include reductions from Pavley and LCFS regulations.”

“Greenhouse gas (GHG)” emissions are used as equivalent to the more accurate “CO2 emissions.” In the second item, “Pavley” (named after Senator Fran Pavley) refers to a lowered average CO2 per mile driven. Also in the second item, “LCFS” refers to the “Low Carbon Fuel Standard”. Both “Pavley” and the “LCFS” reduce the emissions per mile driven. Since these reductions are not being counted, the reductions shown come only from per capita, percent reductions in driving, or “vehicle miles travelled”, VMT. Therefore the so-called GHG reductions are really VMT reductions.

<sup>1</sup> The letter is Reference 1, listed at the bottom of this letter and attached in the email with this letter.

<sup>2</sup> S-30-05 is shown in Reference 2, listed at the bottom and attached in the email with this letter.

## More Background Information

In 2007, you (SANDAG) adopted your current Regional Transportation Plan (RTP). It includes a 38% increase in the total number of freeway-lane miles, in San Diego County. My job as Transportation Chair for the Sierra Club is to stop all freeway expansions, as specified in our National Policy. Our Chapter has commented extensively on the I-5 expansion Draft Environmental Impact Report. As you know, it would add either 4 or 6 lanes, to an eight-lane freeway, over a length of 27 miles.

You (SANDAG) are now in the process of approving a new RTP, with even more freeway expansions. However, your staff now claims that by Year 2035, they will reduce GHG (really VMT, as explained above) from cars and light-duty trucks by 19%. You (the SANDAG Board) and staff can therefore claim, correctly, that you are going to exceed your CARB target, for Year 2035.

However, the GHG reductions of S-3-05 must be achieved by mankind, if we are to have any reasonable chance of stabilizing our climate. A destabilization will likely have disastrous environmental and human consequences.

The purpose of this letter is to show you that the GHG (really VMT) reduction achieved must be at least 35%, not the 13% given by CARB and not the 19% that your staff now claims they can achieve by 2035.

## Overview of Relationships and Derivation of Key Formula

The S-3-05 net reduction in GHG emissions, from cars and light-duty trucks, expressed as a fraction of 2005 emissions, is obtain by multiplying four factors together. The definitions of Table 1 apply.

**Table 1                      Factor Definitions, with Respect to Year 2005**

<b>Factor Definitions</b>	
<i>All are for for the year of interest, with respect to year 2005 values. Except for Population, all are for cars and light-duty trucks.</i>	
<b>f</b>	<b>net factor of the emissions of Greenhouse Gas</b>
<b>f_Pavley</b>	<b>factor of the average statewide mileage</b>
<b>f_Fuel</b>	<b>factor of the reduction of GHG due to fuels that burn less carbon</b>
<b>f_Population</b>	<b>factor of the population in the region of interest</b>
<b>f_PerCapitaVMT</b>	<b>factor of per capita driving</b>

The following equations apply.

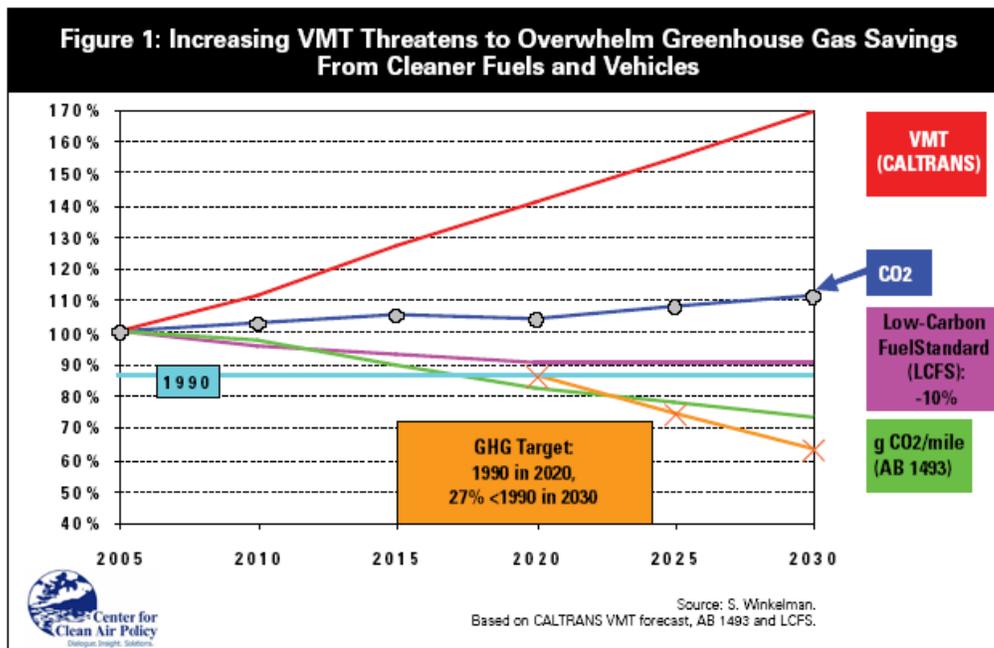
$$\text{Eq. 1} \quad f = f_{\text{Pavley}} \times f_{\text{Fuel}} \times f_{\text{Population}} \times f_{\text{PerCapitaVMT}}$$

Eq. 2 is derived from Eq. 1.

$$\text{Eq. 2} \quad f_{\text{PerCapitaVMT}} = f / ( f_{\text{Pavley}} \times f_{\text{Fuel}} \times f_{\text{Population}} )$$

Figure 1 is from <http://www.nrdc.org/globalWarming/sb375/files/sb375.pdf>, a widely-respected report on SB-375. Note that all of its values are in the units of factors (same as fraction) of their values in year 2005. Figure 1 will supply all of the needed values, except for the factor of population. (Neither the red line nor the blue line are used.) Its gold line is the S-3-05 trajectory that CARB ignored when it issued the driving reduction values for year 2035.

**Figure 1** GHG Reductions from Pavley (AB 1493, in Green); the Low Carbon Fuel Standard (in Purple); the Predicted Driving (VMT, in Red); the Net Result of GHG (CO2, in Blue); and & the S-3-05 Trajectory (in Gold)



### Getting the Net Factor of the Emissions of Greenhouse Gas in 2035, with Respect to 2005 Values

To get the net factor of the emissions of GHG, for year 2035, and with respect to year 2005, it is necessary to extrapolate the Governor’s Executive Order target values (the gold line of Figure 1), out to year 2035. The gold line shows that this factor is 0.87 in 2020 and is 0.64 in 2030. Therefore, in year 2035, the factor will be

$$0.64 + [(0.64 - .87) / (2030-2020)] * (2035-2030) = 0.525$$

### Getting the Factor of the Average Statewide Mileage in 2035, with Respect to the 2005 Value

To get the Pavley reduction factor, for Year 2035, it is necessary to extrapolate the average statewide mileage factor data, which is Figure 1’s green line, out to Year 2035. It is 0.82 in 2020 and it is 0.73 in 2030. Therefore, in year 2035 the statewide mileage factor data will be

$$0.73 + [(0.73 - .82) / (2030-2020)] * (2035-2030) = 0.685$$

Pavley 1 ends in Year 2017. It is widely assumed that it will be replaced by what is often called “Pavley 2”. The extrapolation computed here is based on the assumption made by the author of

Figure 1, as shown in the slope of the green line from year 2020 to 2030. Based on the authoritative credentials of the authors of Figure 1, this is the best assumption that can be made. Assuming that the California fleet will continually get more efficient, in terms of CO2 per mile driven, relies on an assumption that a significant fraction of our car owners will be able to purchase newer-model cars.

### **Getting the Factor of the Reduction of GHG Due to Fuels that Burn Less Carbon**

Looking at the purple line of Figure 1, it is clear that this factor will be 0.9 in 2035.

### **Getting the Factor of the Increase in Population**

The factor for population in San Diego County is computed using the populations estimated in CARB's <http://arb.ca.gov/cc/sb375/mpo.co2.reduction.calc.pdf>, namely 3,034,388 people in 2005 and 3,984,753 people in 2035. So the factor, from 2005 to 2035 is  $3,984,753/3,034,388 = 1.313$ .

### **Computing the Required Driving Reduction, for 2035**

The 4 values computed above are used in Eq. 2 to compute the required factor.

$$\text{Eq. 2 } f_{\text{PerCapitaVMT}} = .525 / ( .685 \times 0.9 \times 1.313 )$$

Therefore,  $f_{\text{PerCapitaVMT}} = .649$ . **This corresponds to a 35.1% reduction in per-capita driving, in year 2035.**

### **In Conclusion**

You must not conspire with CARB to violate S-3-05. Your RTP must achieve a 35% reduction. Reference 1 shows how this can be done. You have a responsibility to get CARB and SANDAG back on a path of moral and responsible leadership. The current 2035 targets undermine S-3-05.

Respectfully submitted,



Mike Bullock, 760-754-8025

Chair of the Sierra Club San Diego Transportation Committee

### **References Attached with Email**

**Reference 1:** PROPOSED REGIONAL GHG EMISSION REDUCTION TARGETS FOR AUTOMOBILES AND LIGHT TRUCKS PURSUANT TO SENATE BILL 375 (Released: August 9, 2010, for a September 23, 2010 Consideration) and the Failure of Its Proposed SANDAG GHG Reductions to Protect Health, Support S-3-05, and be Just and Reasonable

**Reference 2:** S-3-05, with additional comments

Copies: C. Chase, P. Epstein, Richard Miller

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**The San Diego Chapter of the Sierra Club is San Diego's oldest and largest grassroots environmental organization, founded in 1948. Encompassing San Diego and Imperial Counties, the San Diego Chapter seeks to preserve the special nature of the San Diego and Imperial Valley area through education, activism, and advocacy. The Chapter has over 14,000 members. The National Sierra Club has over 700,000 members in 65 Chapters in all 50 states, and Puerto Rico.**





**Sierra Club Toiyabe Chapter/Southern Nevada Group  
Motion for Support Environmentally-Sound Road-Use Fees  
DRAFT May 2 with Oct. 4<sup>th</sup>, 16<sup>th</sup>, Nov. 9 & Jan21, 2011 Revisions**

<p><b>Chapter Leads:</b> Mike Bullock, San Diego Transportation Chair (assigned by Jane Feldman) and Energy Task Force Chair Joe Johnson <b>Sponsor (if not SNG):</b> <b>Topic Area:</b> Conservation, Transportation <b>Desired Effective Date:</b> March 2011, if possible <b>Time Sensitive:</b> ASAP, due to global warming <b>Reason for Time Sensitivity:</b> NDOT wants comments <b>Approved by Conservation Committee:</b> Date</p>	<p><b>Brief Description of Proposed Position:</b> Support for an Equitable and Environmentally-Sound Road-Use Fee Pricing and Payout System, to be submitted to our state of Nevada, as it considers what NDOT is currently calling a “VMT” fee.</p>
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**Resolution**

WHEREAS, unchecked Green House Gas (GHG) emissions will destabilize our earth’s climate, causing a human catastrophe; 27% of Nevada’s GHG emissions are caused by on-road transportation; in order to keep GHG levels below 450 PPM, it will be necessary for the world to reduce emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050; to obtain these reductions in on-road emissions, Nevada must significantly reduce driving; and

WHEREAS, the current gas tax cannot provide the money needed for road repairs; Nevada has not raised its gas tax in 18 years and there is no known significant support for such an action; the gas tax is effectively our only road-use fee; better mileage and more electric vehicles will reduce gas tax revenue; a gas tax cannot account for time, place, driver’s income, vehicle weight, vehicle pollution levels, vehicle noise levels, or roadway congestion level; Sierra Club national policy opposes subsidized road use, even for battery-powered cars; and

WHEREAS, road expansions are promoted using fear of current or predicted congestion; the Toiyabe Chapter currently has no viable, low-cost, short-term strategy to alleviate congestion; reducing driving through full-cost pricing and congestion pricing is a proven, short-term, free-market strategy to alleviate congestion; the under pricing of road use contributes significantly to air pollution, congestion, sprawl, and GHG emissions; revenue from taxes that are unrelated to driving are used to support roads; on July 11, 2009, the California Nevada Regional Conservation Committee of the Sierra Club passed a resolution supporting a “comprehensive road-use fee pricing system”; the Nevada DOT is accepting comments on a “VMT Fee” proposal; Article 9, Section 5 of the Nevada constitution requires that any charge, with respect to the operation of any motor vehicle, be used exclusively for the construction, maintenance, and repair of the public highways of the State; and, finally, while sprawl-supporting schemes, consisting of in-project road building and “development fees” to widen existing access roads, are better than subsidies from the general public, they are still a hidden and unfair subsidy to driving, that increases driving, because the ultimate payers of these costs pay an amount (for example in the cost of a home or in the cost of some other consumer item or service) or at a rate (for example a reduced wage or increased rent), which is unaffected by how often they personally chose to drive on the constructed, in-project roads or added lanes on access roads.

THEREFORE LET IT BE RESOLVED, that the Sierra Club Toiyabe Chapter/Southern Nevada Group supports a comprehensive road-use fee pricing and payout system, along with the required amendment to the Nevada constitution, provided that the pricing and payout system (1) would pay for all road-use costs, including the environmental and health costs caused by driving; (2) would pay out to cover all costs and repay all those losing money because of such things as road construction and operation; (3) could still include a fuel tax or fee; (4) would have a vmt fee (price-per-mile) that would vary by such things as the weight (to account for road wear), pollution level, noise level, and safety record of the vehicle (to reduce insurance rates, if it is shown that such payments are needed, as described in Item (2) of this paragraph; (5) would have a vmt fee (price-per-mile) that would vary by such things as road, road segment, date, and time of day; (6) would include instantaneous congestion pricing when that

technology becomes feasible; (7) would keep the per-mile price incentive to drive energy-efficient cars at least as large as it is with today's fuel excise tax; (8) could be accompanied by tax reductions sized to achieve either net-revenue neutrality or near-net-revenue neutrality; (9) would adjust the green-field development road-building and development-fee-assessment scheme so that a fair share of road-use revenue is paid to those that lost or are losing money, due to the scheme; (10) may be used to fund such things as bicycle facilities, bicycle education, bus pullouts, bus stops, sidewalks, and landscaping; (11) would mitigate impacts on low-income users by, for example, giving low-income drivers price reductions, especially for necessary driving; (12) would have ACLU-approved privacy protections that would include a prohibition of government access without court approval and would also include periodic and random software and hardware checks by ACLU-approved experts, to prevent the creation of infrastructure for routine surveillance.

THEREFORE LET IT BE ALSO RESOLVED, that the Sierra Club Toiyabe Chapter/Southern Nevada Group will communicate this position to the Nevada Department of Transportation ([vmtfeestudy@vmtfeenv.com](mailto:vmtfeestudy@vmtfeenv.com)), the Governor, the state legislative bodies, our federal representatives for use in climate protection legislation, the media, our local government officials, other interested environmental and/or civic-minded groups, all interested political parties, and our membership through website and newsletter communication, as our limited resources will permit.

### Supporting Data

- National Sierra Club policy on transportation, <http://sierraclub.org/policy/conservation/trans.aspx>, is opposed to all subsidies to road use, saying, "These subsidies should be publicly scrutinized and eliminated".
- According to a State website, <http://www.vmtfeenv.com/questions.html>, "The current federal and state fuel taxes were last increased in 1992. During the last 18 years, inflation has eroded the purchasing power of fuel taxes by approximately 52%. Whereas, during the same time, construction costs have gone up significantly."
- Also (same website), "Vehicle fuel efficiency increased from an average of 11.8 miles per gallon in 1970 to nearly 20 today. Fuel-efficient vehicles now entering the marketplace will further increase the average miles per gallon. While beneficial from an environmental and energy conservation perspective, and something the state wants to encourage and reward, fuel-efficient vehicles alter the ability to fund the maintenance, preservation and modernization of our roads."
- Also (same website), "If a VMT fee were to become law, the legislature could determine a per-mile rate. The rate could be flat, treating everyone the same, or it could be varied to consider other state policies like environmental issues, time of day and congested roads, type of vehicles, or urban/rural issues. Options might include charging a lower rate-per-mile for vehicles that achieve a certain level of fuel efficiency, for motorists that avoid rush hour zones, or for those making other environmentally-friendly decisions."
- According to Table ES-1 of the *Nevada GHG Inventory and Reference Case Projections, 1990-2020* ([http://www.wrapair.org/ClimateChange/NV\\_GHG\\_I&F\\_Report\\_WRAP\\_08-20-07.pdf](http://www.wrapair.org/ClimateChange/NV_GHG_I&F_Report_WRAP_08-20-07.pdf)) the MMT CO<sub>2</sub>e fraction of emissions due to on-road transportation, of the gross total emissions, is  $14.4/53.7 = 26.8\%$ .
- The CNRCC Resolution of July 11<sup>th</sup>, 2009, in support of a "comprehensive road-use fee pricing system", and its "Reference Document" are attached.

### Supporting References

- Club's national policy on transportation, <http://sierraclub.org/policy/conservation/trans.aspx>

- Club's internal site  
<http://clubhouse.sierraclub.org/login.aspx?ReturnUrl=%2fca%2fcnrcc%2findex.asp>, then, after typing in the password and getting the home page of the CNRCC, within the “Records and Archives” box, seen on the left side after scrolling down; select the “Resolutions Archives” and then the “July 2009” link to see both the Resolution and the “Reference Document” for all of the background information. (Dr. Stewart will make this final link active.)
- The other references are given above in the “Supporting Data” section

### **Description of Club Policy (or references)**

These are given in the Resolution, Supporting Data, and Supporting References sections.

### **Counter-Arguments and Response**

- 1.) We can meet our responsibility to oppose subsidized driving by simply being in favor of increasing the gas tax, even though this does subsidize cars that are electric and there is no discussion of this option currently.
- 2.) Talking about the cost of driving will make us unpopular, or, in more sophisticated language, this will “spend our political capital” that we need for more important battles.
- 3.) If we send a letter to the Nevada DOT, they will misuse our support to claim we support a flat-fee VMT charge regardless of weight, mileage and so on.

### **Chapter Commitment Required Resources (time, money, etc)**

a. This resolution will be meaningful if the only action is an email to the Nevada DOT. Since all actions can be accomplished by email, the only resource needed is volunteer time. b. The second “Therefore let it also be resolved” lists the actions in the approximate order in which they should be taken. However, the actual order will also depend on volunteer choice.

### **Next Steps**

Upon approval, begin work on a letter to the Nevada DOT.

### **Campaign Planning Matrix**

If we want to educate our members and get them to also send emails of support, this could be done.

From the Sierra Club's publication Grassroots Organizing Training Manual, 1999

Available at

[http://clubhouse.sierraclub.org/leaders/training/training\\_manual/index.htm](http://clubhouse.sierraclub.org/leaders/training/training_manual/index.htm)

#### **1. Issue focus**

What's the environmental problem you are seeking to address?

This work seeks to address our climate crisis and all the other impacts from automobiles.

How does it relate to the Club's national conservation priorities?

This work advances the Club's national policy goals regarding transportation, land use, and climate change.

## 2. Campaign goals

Increase community respect by submitting constructive principles into an important, on-going debate. The goal is to make a better environmental outcome more likely. This work will increase our profile and may therefore increase our membership and funding. This will establish working relationships into government that currently do not exist.

### Conservation goals

Reduced driving and a more sophisticated understanding of economics and how it drives environmental outcomes.

### Organizational goals

A functioning Transportation Committee to respond to all stages of relevant decision making in Nevada.

## 3. Lay of the Land

Nevada citizens are opposed to a VMT fee. They worry about privacy. They underestimate the danger of climate change. The Nevada DOT website on this issue however shows a rational approach to a serious funding and political problem.

### Organizational Strengths and Weaknesses

The chapter has leaders that are open-minded, dedicated, and frankly brilliant. They know the important environmental issues in their area and are in touch with Nevada politics. However, it has no one with a long-standing interest in the economics of transportation.

### Allies and Opponents

The Universities should appreciate our help. There will be a considerable amount of interesting mathematical work to achieve all goals. The University may come to see a different aspect of Sierra Club concerns. Elements within the Nevada DOT may appreciate our efforts. Those who benefit from ever-increasing VMTs and sprawl may be opposed to this work. All citizens that understand global warming will want to help us. This may include some religious groups, Unitarian Universalists, for example. Groups that fear government and change may oppose this effort.

## 4. Strategy

As communications go out, it would be best, if time permits, to schedule meetings and establish as many long-lasting relationships as possible.

### Strategic vehicle

### Targets

Decision makers (primary targets): DOT

Decision makers (secondary targets): elected officials

Public groups: civic, political (Democrats, Republicans, Greens, Etc) and including our own membership

## 5. Campaign communication

Message and slogan: start with resolution title “Equitable and Environmentally-Sound Road Use”

Story: start with resolution

Media outlets: use chapter members that have experience with media.

## 6. Tactics and timeline

The Nevada DOT needs input this year. Start there and work down the list as time permits.

## 7. Resource management

Budget: none

Donors/fundraising: none needed

Volunteer recruitment and stewardship: Transportation Committee Membership and others as needed



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

EMAILED: February 21, 2012

February 21, 2012

Mr. Jacob Lieb  
Southern California Association of Governments  
818 W. Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

## **Comments on the Draft 2012-2035 Regional Transportation Plan, Sustainable Communities Strategy, and Draft Program Environmental Impact Report**

The South Coast Air Quality Management (AQMD) staff appreciates the opportunity to comment on the Draft Program Environmental Impact Report (Draft PEIR) and the Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (Draft RTP/SCS). AQMD staff appreciates the inclusion of strategies in the Draft RTP that will reduce vehicle miles travelled (VMT). These strategies are a fundamental aspect of the plan and are needed to achieve transportation conformity requirements under the federal Clean Air Act. However, additional pollutant reductions beyond transportation conformity requirements must be found for the South Coast Air Basin (SCAB) to achieve National Ambient Air Quality Standards (NAAQS). Pursuant to the Clean Air Act, if the SCAB does not meet NAAQS on time, the region could lose federal transportation funding. This loss of funding could hinder achieving the goals of the Draft RTP/SCS. In addition, new tools and funding sources for SCS implementation will be required to overcome the additional hurdles that local jurisdictions face with the recent loss of redevelopment agencies. Therefore, we look forward to SCAG's continued significant involvement in the development of the 2012 Air Quality Management Plan in order to ensure that the transportation system contributes its fair share of pollutant reductions in our basin.

### Transportation and Goods Movement Strategy

The AQMD staff appreciates that the lead agency has worked with our staff and the California Air Resources Board staff to develop an aggressive plan containing transportation policies that promote zero emission technologies. These policies and projects will provide regional and local air quality benefits. For example, as a part of the plan's goods movement strategy, the lead agency has included full deployment of zero emission transport for all container drayage between the ports and near-dock rail yards by 2020 (Goods Movement Appendix to RTP, page 34). Further, the Draft RTP has included zero emission freight corridors that could yield significant regional emission reductions and reduce near roadway emissions exposure in a timely

manner. AQMD staff looks forward to our joint efforts with SCAG staff on future demonstration and deployment of these important technologies, including a zero emission on-road demonstration project within the next one to three years. Further information in the Final EIR and RTP about the following strategies would be helpful to provide clarity in how these aspects of the plan impact air quality.

- Although zero emission technologies are described in the Draft RTP, it is not clear to what extent the emission reductions from these projects have been included in the constrained plan (e.g., RTP Table 2.11). The Final RTP/SCS and PEIR should include specific details about how much of the emission reduction benefits of the I-710 corridor project, East-West freight corridor project, and zero emission deployment from the ports to near dock rail yards are included in the 2035 emission calculations.
- SCAG should work with local transportation agencies, the ports, and other private and public stakeholders to identify funding in the constrained plan for zero-emission technology demonstrations (or initial deployments) in the port to near dock rail yard corridor. These should involve multiple technologies, including technologies with potential for regional application, and should involve major truck manufacturers. Such demonstrations can and should be initiated by no later than 2013 and should include testing and evaluation of wayside power (e.g., catenary trucks), battery electric trucks, and fuel cell trucks. AQMD will partner in supporting this measure (e.g., funding, seeking funding partners, and developing other support).
- The Draft RTP/SCS includes several key port-related projects such as the Southern California International Gateway (SCIG) and Modernization of the Intermodal Container Transfer Facility (ICTF) that are considered critical to the regional goods movement system and will have serious air quality implications for the basin and substantial impact on the heavy duty truck distribution in the region. Specifically, the Draft RTP/SCS indicates these projects are needed to address an overall growth volume at the San Pedro Bay Ports of up to 43 million containers by 2035 - more than tripling current levels. In addition, this significant growth in heavy duty truck traffic calls for the need to develop zero and near-zero emission goods movement technologies.

#### Freeway Impacts to Sensitive Receptors

The Draft PEIR indicates that the proposed project will place an additional 200,000 people within 500 feet of freeways in the SCAG Region. Areas within 500 feet of a freeway typically experience significantly elevated levels of mobile source pollution compared to areas outside this buffer zone. The AQMD staff recognizes that the placement of concentrated populations next to freeways is in response to the SCS policies that encourage growth adjacent to transit and other transportation facilities, however, it is not clear how SCAG determines that the potential impacts to future residents in these areas are insignificant.

Specifically, page 3.2-31 in the Draft RTP/SCS PEIR states that Mitigation Measure-AQ19 (MM-AQ19) will reduce this impact to a less than significant level. MM-AQ19 describes requirements that lead agencies should implement for conducting Health Risk Assessments, maintaining buffer zones from some pollution sources, and installing particulate filters in building ventilation systems to reduce particulate exposure. However, it is not clear how this

mitigation measure will be implemented. Because the Draft RTP includes substantial growth in population in these freeway proximate areas, SCAG should commit to researching the effectiveness of mitigation to reduce pollutant exposures in these areas and working with other state and local agencies on further policy development to reduce near freeway exposure.

### Implementation Monitoring and Tracking

#### *SCS Performance Measures*

One of the primary goals of the SCS is to decrease per-capita greenhouse gas emissions from passenger vehicles and light duty trucks. These greenhouse gas reductions will have the co-benefit of reducing emissions of criteria pollutants. Because the SCS is an integral part of the RTP and therefore the AQMP, timely implementation of the SCS goals is relied upon to meet air quality standards. As a result, the AQMD staff requests that the plan be revised to include a periodic tracking and reporting element for the SCS that would occur more frequently than the regular RTP cycle. Specifically, staff requests that the tracking process not be limited to policy review of the SCS, but also include identification of revenue sources (see Funding comments below), and other metrics deemed appropriate by SCAG. These reported metrics should be made available to the public to ensure that our basin remains on track to meet AQMP goals.

#### *Funding of the RTP*

As required by federal regulation, SCAG has included a financial plan to demonstrate how the transportation plan can be implemented [23 C.F.R. §450.322(f)(10)]. The plan includes financial resources that are “reasonably expected to be available” to carry out the plan [§450.322(f)(10)(ii)]. However, about \$219.5 billion out of a total of \$524.7 billion in costs of the proposed 2012 RTP are expected to be funded by “new” sources of funds that are not currently available (“core” funds). This means that over 40% of the total cost of the plan is dependent on future new funding. Federal regulation provides that in the case of new funding sources, “strategies for ensuring their availability shall be included.” [450.322(f)(10)(iii)]. A review of the “new” funding sources indicates that most would require further action by the state legislature, Congress, and/or a vote of the people. Moreover, federal regulations require the financial plan to “address the specific financial strategies required to ensure the implementation of TCMs in the applicable SIP.” [§450.322(f)(1)(vi)]. We are concerned that these strategies are not sufficiently identified and assured of implementation.

State law also requires the RTP to include a financial element, which must summarize “the cost of plan implementation constrained by a realistic projection of available revenues.” [Government Code §65080(b)(4)(A)]. The financial element may recommend the development of specified new sources of revenue. However, in describing the requirement for “financial constraint,” the treatise *California Transportation Law* (Solano Press, 2000; March, Jeremy) provides at page 139 that the plan should:

- “Explain the consequences of living with existing revenues only, including what parts of the plan would not be achievable (without new revenues).”

- Indicate alternative policy directions if proposed revenues are not realized, and the time frame when the change in policy direction should be undertaken if proposed revenues are not forthcoming.”

The RTP does not currently present sufficient information to demonstrate why the “new” funding sources must actually become available. Moreover, it does not identify which measures or projects are to be funded by “core” revenues (those already available or committed) and which are to be funded by “new” sources. In order for the public and policymakers to have a clear understanding of why the “new” funding sources must become available, and thus to implement the needed steps for this to occur, the RTP should clearly identify the consequences if the plan were forced to depend only on “core” funding.

### Transportation Control Measures

AQMD staff initially requested that SCAG prepare an analysis in the Final RTP/SCS of what transportation control measures would be needed to offset growth in emissions due to growth in VMT, if the decision in *AIR v. EPA* were to become final [632 F.3d 584 (9<sup>th</sup> Cir. 2011)]. The conformity section of the Draft RTP acknowledged in a footnote that the RTP would not be sufficient, but did not explain what would be required. On January 27, 2012, the Ninth Circuit Court of Appeals denied EPA’s petition for rehearing in that case. As a result, AQMD staff is now requesting a scenario analysis that includes the incremental emission impact in the SCAB due to VMT growth. This scenario analysis would use the difference between 2035 VMT and the VMT from years 1997, 2008, and 2012, and applicable vehicle emission rates in 2035. The Draft EIR compares today’s emissions with future emissions, and compares emissions with the project compared to emissions without the project. We request that SCAG analyze the emissions impact of growth in VMT. For illustration purposes, staff reiterates its request that the RTP also include an analysis of what additional Transportation Control Measures (TCMs) it would take to comply with this decision.

### Public Availability of SCS Details

In order to provide certainty and transparency to the public, the details regarding the planning assumptions in the RTP/SCS (such as housing density, distribution of employment, etc.) should be made publicly available upon approval of the Final RTP/SCS. Because the RTP/SCS will be used to determine whether future projects can utilize new CEQA streamlining procedures, stakeholders need to have a readily available data source that describes what planning assumptions are included in the SCS. This final SCS planning scenario at the local level should be published and available to the public, and any future changes/amendments should also be made available for review so that all stakeholders can evaluate the consistency of future projects with the SCS.

### Economic Analysis

The AQMD staff appreciates SCAG’s participation at the February 1, 2012 study session on the economic impact of the Draft RTP/SCS. At that meeting SCAG acknowledged and clarified the limitations of the Draft RTP/SCS economic analysis released in December of 2011 and presented the results from additional analyses. Based on our understanding of the economic analysis from

that meeting, we request that SCAG provide further clarification on its methods in assessing RTP employment impacts. This information is crucial because the AQMP heavily relies upon employment figures generated by the RTP for emission projections. For example, the Draft RTP assumes that employment will be the same with and without the plan (Table 3.10-10 of the Draft EIR). Any additional analysis conducted after the draft document on job impacts should be released prior to approving the Final RTP and should provide more detailed description on the analysis assumptions and proper interpretation of the results. Also, the AQMD staff recommends inclusion of the financing component of operation and maintenance expenditures in the job impact assessment of the RTP/SCS.

#### Contact Information

The inclusion of these items coupled with a continued emphasis on zero and near zero emission transportation technologies in the region could formulate a plan that provides a path for sustainable communities, achieving regional air quality goals, and reducing public health impacts from future transportation infrastructure. The AQMD staff looks forward to continuing to work with SCAG in pursuit of air quality standards in the region and improve air quality for all residents in the South Coast Air Basin. Please contact me at (909) 396-3186 should you have any questions regarding these comments.

Sincerely, \



Elaine Chang, DrPH

Deputy Executive Officer

Planning, Rule Development & Area Sources

PG:BB:IM:SL:DG

ALL121229-01

Control Number



City of La Habra

"A Caring Community"

ADMINISTRATIVE BUILDING

201 E. La Habra Boulevard  
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February 13, 2012

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

Re: SCAG Draft RTP/SCS and PEIR

Dear Mr. Ikhata,

On behalf of the City of La Habra I would like to commend the Southern California Association of Governments (SCAG) and its staff who worked hard to prepare the draft Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) the Program Environmental Impact Report (PEIR), and associated documents. This effort was monumental and unprecedented in our history and throughout the process collaboration between SCAG and Orange County stakeholders has been exceptional.

As you are aware, Orange County took upon itself the task of developing a subregional SCS. The continued cooperation of SCAG staff and the numerous references throughout the document where the RTP/SCS expressly states that it incorporates the Orange County Sustainable Communities Strategy (OC SCS) into the RTP/SCS document is greatly appreciated.

The OCCOG Technical Advisory Committee (OCCOG TAC), of which the City of La Habra is an active member, created an ad hoc committee dedicated to the review of the Draft RTP/SCS.

The following general comments and recommendations are offered by the City of La Habra in conjunction with the OCCOG on the draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (draft RTP/SCS) and associated Appendices and draft Program Environmental Impact Report (draft PEIR). The City of La Habra requests that this letter and its attachments be included in public record as our collective comments on the draft RTP/SCS, PEIR and associated documents.

#### 1. GROWTH FORECASTS

**Issue: Growth Projections:** The 2012 growth projections identify population, housing and employment data for the six-county SCAG region, from 2008 (existing) to 2020 and 2035. These growth projections represent the best available information from local

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jurisdictions, the business community and landowners. However, as time passes, what is feasible for any given project can change. The triggers for change to adopted growth projections can range from factors such as market conditions, new information or data, infrastructure availability, changes in funding availability (such as the dissolution of redevelopment agencies statewide), and changes to jurisdictional boundaries resulting from future annexations and incorporations of previously-designated unincorporated territory. SCAG should continue to adopt the 2012 growth projections at a countywide level, consistent with past approvals of Regional Transportation plan growth forecasts. A county level of geography accommodates internal adjustments to changing conditions as described above, without compromising the integrity of the overall growth projections. However, approving the growth projections at any lower level of geography, such as at the city level, would be challenged with continual revisions and shifts to the total number of housing, population and employment within a city, among cities, and between cities and counties as a result of the factors described above. Adoption of the data at a level lower than the county would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the RHNA allocations must be consistent with the RTP/SCS; state law does not require that they be identical. The RTP/SCS can be adopted at the county level and the RHNA process may proceed independently until it is completed after the appeals, trades, and transfers are completed. The RHNA allocations that were derived from the growth forecast can still be determined to be consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.

**Growth Projections Recommendation: SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, and not at a smaller level of geography such as city, census tract, or traffic analysis level.**

**Issue: OCP-2010 Modified:** On January 26, 2012, the update to the OCP-2010 dataset known as "OCP-2010 Modified" was officially approved by the OCCOG Board of Directors and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this letter also serves as the formal notice of the update that should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.

**OCP-2010 Modified Recommendation: All documents, tables, maps, narrative, modeling runs, PEIR Alternatives (including Alternate C/3/Envision 2 referencing the Orange County growth forecasts) should be updated with the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors and consistent with the subregional delegation MOU between OCCOG, OCTA and SCAG.**

## **2. DRAFT RTP/SCS**

**Issue: 2012 Draft RTP/SCS:** The RTP/SCS identifies strategies to reduce greenhouse gas emissions from cars and light duty trucks. Because counties, jurisdictions and agencies have different needs and feasibility of implementation, we believe these

strategies should be clearly identified as a menu of options that can be used to achieve the goal of reduced GHG emissions. However, the document can be construed to suggest that each of the strategies listed in the table on pages 150-153 are necessary to successfully implement the SCS, many of which are beyond SCAG's purview or control. It is requested that the language be clear that it is permissive.

**2012 Draft RTP/SCS Requests:**

1. **Revise language on page 149: "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which that help can and should undertake in order to successfully implement the SCS."**
2. **Please provide SCAG analysis supporting the strategies in the Draft RTP/SCS Chapter 4.**
3. **Please describe what municipal obligations are anticipated as a result of adopting these strategies as a list to be accomplished rather than a menu of options.**

**Issue: OC SCS Strategies:** There are strategies in the Orange County SCS that are not included in the regional SCS. Similarly, there are some strategies in the regional SCS that are not consistent with the strategies in the OC SCS. This creates confusion and clarification is needed.

Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional SCS's that SCAG is then required to incorporate into the regional SCS. In Orange County, the Orange County Council of Governments (OCCOG) and the Orange County Transportation Authority (OCTA) developed a countywide or subregional SCS (OC SCS) that was to be incorporated in whole into the SCAG SCS. Local agencies in Orange County developed the OC SCS and approved it in June 2011. SCAG has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the regional SCS, but it is unclear what the standing is of the OC SCS. The OC SCS contains a set of strategies that were agreed upon by local governments, agencies and other stakeholders within Orange County and was accepted by SCAG and should represent the SCS that is applicable to the Orange County region.

On Page 8 discussion is provided regarding the Sustainable communities strategy 2012-2035 plans to SB 375 integrate the transportation network with new development but minimal discussion is provided as to how that will be achieved and how it will be funded.

Discussion of the need for cities to dramatically increase the reach of transit in our communities is provided on Page 13 but no definition of what "dramatically" means is provided. La Habra has no transit centers.

High speed rail is discussed on Page 21 but no approved alignment has been reached. It is very likely the BNSF right-of-way will be utilized. This being the case, very little benefit will be forthcoming to the City of La Habra due to the distance to the rail line.

The RTP suggests planning for electrification of the vehicle fleet and supporting new automobile technology on Page 30 but no discussion is provided as to how the improvements will be funded.

On page 53 there is discussion of making deficient sidewalks accessible to all. The City supports such action but minimal funds are made available to accomplish the task.

The RTP notes on page 80 that the transportation and safety mitigation program includes: increasing ride share and work at home opportunities, invest in land use transportation connection projects, investments to reduce heavy duty truck delays, enhance transportation infrastructure practices to enhance security and working to enhance emergency preparedness. There is no discussion as to how the improvements will be funded.

The City of La Habra is limited to bus service as a means of regional transportation. Alternative modes of transportation, as per page 81, to communities like La Habra need to be discussed further and how those improvements will be funded.

State or County agencies should be mandated to publish lists of contaminated properties where new development would disturb contaminants and provide them on a yearly basis to cities as suggested on Page 83.

A discussion of Measure M in Orange County should be included on page 133.

Page 139 discusses bringing the majority of sidewalks and intersections into compliance with ADA. The City of La Habra continues to make improvements to intersections when street improvements are proposed. What presents a challenge to the City are continued changes to the accessibility requirements which make recently completed improvements obsolete. The plan also suggests improved traffic signal synchronization projects but how those improvements will be funded are not discussed.

The City is limited to regional bus transportation. The land use growth strategies discussed on page 149 revolve around transportation centers typically associated with rail lines. Should the gold line be extended to Whittier, the proposed line could be extended into La Habra and onto Fullerton where it could connect to the Fullerton transit center then making it possible for a transit center in La Habra.

The conversion of the City's fleet to electric or other zero-emission transportation technologies as noted on page 153 could be possible if funds were made available for the construction of the infrastructure and vehicles themselves.

**OC SCS Strategies Recommendation: Please revise the text in the last paragraph on page 106 to state: "These subregional SCS documents are incorporated into the regional SCS and represent the SCS for each of these subregions."**

### **3. DRAFT PEIR**

**Issue: Mitigation Monitoring Program Intent:** It is unclear how SCAG intends to implement the Mitigation Monitoring Program with regard to the proposed mitigation measures, as may be implemented by local agencies. Section 1-5 of the PEIR specifically provides that “Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG’s monitoring efforts, including SCAG’s Intergovernmental Review (IGR) process.” It is infeasible for SCAG to require local jurisdictions to report when such mitigation measures are considered for any project. Noting that the SCAG region includes 6 counties, 14 subregional entities and 191 cities, this reporting requirement would surely fall short of expectations. Given this identified infeasibility, please clarify what obligations local agencies may have regarding SCAG’s mitigation monitoring efforts.

#### **Mitigation Monitoring Program Intent Requests/Recommendations:**

- 1. Does SCAG intend to require all jurisdictions that avail themselves of the mitigation measures to report to SCAG when such measures are considered for any project?**
- 2. SCAG’s approval of the PEIR needs to clearly state the intent and applicability of the mitigation measures and the PEIR reflective of our comments below and that mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.**
- 3. Add language to Executive Summary and Introduction: “Mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.”**

#### **4. Feasibility and Applicability**

On pages 1-5 and 1-7, the language should reflect that Lead agencies will determine the feasibility and applicability of measures and that the measures are intended to offer a menu of options available should a lead agency opt to utilize them. The PEIR makes the assertion on page 1-7 of the Project Description under Transportation Project Mitigation and Land Use Planning and Development Project Mitigation sections that the draft PEIR has made a preliminary determination that all of the mitigation measures in it are considered feasible. SCAG has not identified any analysis that supports the feasibility of the mitigation measures that are to be undertaken by entities other than SCAG and SCAG staff has stated on numerous occasions that the mitigation measures were intended to be a menu of options for consideration by lead agencies.

**Issue: Mitigation Measures Impose Obligations Beyond Scope of SB 375.** Given the combination of the RTP and the SCS processes, as mandated by SB 375, we recognize that SCAG must undertake the difficult task of balancing the goal of having a coordinated regional transportation system with land use strategies that encourage a more compact use of land. However, a key principle of SB 375 is that it is not intended to supersede local agencies’ authority to regulate land uses. Specifically, Government Code section 65080(b)(2)(K) provides, in relevant part that “. . . Nothing in a

sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. . .”

In light of the limitation expressed at Government Code sec. 65080(b)(2)(K), we find language in the PEIR, and specifically the mitigation measures therein, imposing affirmative obligations on local agencies within the SCAG region to be inappropriate and contrary to law. The proposed language as recommended below would remedy the legal conflict with Section 65080(b)(2)(K), yet achieve SCAG's recognition that project-specific environmental review is the appropriate level of review for projects that have their own unique, site-specific circumstances.

The revisions are further consistent with OCCOG's understanding that SCAG intended to provide the mitigation measures as a "toolbox" to local agencies for use within their discretion if and when appropriate for projects within their respective jurisdictions. Indeed, from materials presented by SCAG, including the January 26, 2012 workshop held at the City of Anaheim Council Chambers, SCAG explained that **“This PEIR offers a “toolbox” of mitigation measures** for future project-level environmental analyses. . . . It also includes suggested mitigation measures for local agencies to consider for implementation, if appropriate and feasible (phrased as “can and should”). This language is permissive and not mandatory upon local agencies.”

**Mitigation Measures Impose Obligations Beyond Scope of SB 375 Recommendations:**

1. **Please provide SCAG analysis supporting the feasibility of mitigation measures in the PEIR.**
2. **Change language on page 1-7 found in 2 places under MITIGATION MEASURES, subheadings Transportation Project Mitigation and Land Use Planning and Development Project Mitigation: “This Draft PEIR has made a preliminary determination that the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them where, in the agencies’ independent discretion, the measures are deemed applicable in light specific circumstances at the project level.”**
3. **Change language on page 1-5, first paragraph: “Mitigation Measures proposed in this PEIR are available as tools for implementing agencies and local lead agencies to use as they deem applicable. The implementing agencies and local lead agencies are responsible for ensuring adherence to the mitigation measures as 2012-2035 RTP/SCS projects are considered for approval over time.”**
4. **Please make similar text amendments to other sections, including the Executive Summary, of the PEIR that reference how the mitigation measures are to be used by lead agencies, including the Executive Summary.**
5. **“Can and Should”**

As indicated in the PEIR on page 1-6, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rests with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures (as discussed in Recommendation below). OCCOG recognizes that SCAG's use of the words "can and should" are derived from CEQA, at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies' land use authority, OCCOG deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is inappropriate.

**“Can and Should” Recommendations:** Change language in all mitigation measures identifying entities other than SCAG to read **“can and should consider where applicable and feasible.”** To clarify the intent that the mitigation measures are a menu of options for which feasibility has not been established for any given project, the “can and should” language should be changed in all mitigation measures identifying entities other than SCAG to read **“should consider where applicable and feasible.”**

#### **6. CEQA Streamlining:**

Pages 1-10 through 1-12 describe requirements for the CEQA streamlining offered under SB 375. In each section, it is indicated, consistent with SB 375, for projects to qualify for the CEQA streamlining, mitigation measures from the applicable environmental document must be incorporated into the project. Further, CEQA streamlining relative to the infill exemption under CEQA is also being developed pursuant to SB 226 passed last year.

**CEQA Streamlining Recommendations:** Please clarify how the “menu of mitigation measures” is expected from this PEIR for project to qualify for CEQA streamlining under SB 375 and, if possible, the regulations being developed under SB 226.

#### **7. RTP/SCS Policies**

Please ensure that the discussion of the policies represented by the RTP/SCS in the draft PEIR is consistent with the policies actually in the RTP/SCS. In particular, the bullet list on the page 2-3 is stated to represent the land use strategies of the plan; however, the strategies listed are not specifically identified in the regional SCS. Including different language in the PEIR implies additional policy.

**RTP/SCS Policies Recommendation:** Amend the land use strategies identified on page 2-3 of the Project Description, under the section Purpose and Need for Action to reflect the strategies included in the SCS chapter of the RTP.

## **8. PEIR Mitigation Measures**

By far the most concerning portion of the Draft 2012 RTP/SCS to OCCOG members is the Draft Program Environmental Impact Report (PEIR). Specifically, the proposed mitigation measures included in the PEIR extend to and impact a broad spectrum of technical and policy areas. Many examples of these concerns are included on Attachments 1 and 2 of this letter. In sum, the concerns are that the mitigation measures:

- Appear to go above and beyond the requirements of the Regional Transportation Plan and Senate Bill 375;
- Are measures already required by State and Federal law or are regulated by other agencies such as the South Coast Air Quality Management District, California Department of Housing and Community Development, Fish and Game, and the Regional Water Control Boards;
- Appear to run counter to local control; and
- Are financially infeasible for the agencies responsible for implementation.

### **PEIR Mitigation Measures Recommendations.**

- 1. In order for the mitigation measures to truly be considered a toolbox of options for consideration by various entities in the SCAG region as intended, all mitigation measures in the PEIR intended for entities other than SCAG be moved into an appendix to the PEIR and renamed “Sustainability Strategies”. These strategies could then be identified for consideration by lead agencies as mitigation for future projects should a lead agency choose to do so and deem them applicable and feasible. The PEIR would only retain mitigation measures applicable to SCAG. This action would also require that the Executive Summary, Introduction, and Project Description be updated to reflect the nature of the new appendix of Sustainability Strategies.**
- 2. Remove language within mitigation measures that establishes policies not included in the RTP/SCS or modifies the measure to specify a policy or endorses specific technology which would limit agency authority.**
- 3. In the draft PEIR, please replace text in all mitigation measures that identify policy for either SCAG or other entities with language that reflects either adopted SCAG policies or are policies that are included in the RTP and SCS. Mitigation measures should not be used to establish new policy for the region.**

For example:

- MM-TR 17: “SCAG shall (for its employees) and local jurisdictions ~~can and~~ should institute where applicable and feasible teleconferencing, telecommute, and/or flexible work hour programs ~~to reduce unnecessary employee transportation~~.”

- MM-TR 23: “Local jurisdictions should consider when applicable and feasible coordinated and controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of a feasible, energy efficient Light Emitting Diode (LED) technology.”
- MM-TR 35: “Local jurisdictions should consider where applicable and feasible the adoption of a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation.”

## 9. SCAG Authority

Several mitigation measures identify actions that SCAG shall undertake to mitigate impacts of the plan. Many appropriately direct SCAG to provide a discussion forum or serve as a central data repository for a broad range of topics that affect the region as a whole. However, many measures inappropriately direct SCAG to establish practices, standards, or policy in areas unrelated to what SCAG has purview over. Further, the measures often appear to be directed at policy implementation that is unrelated to the plan itself, such as implementing AB 32. Such measures will essentially require SCAG to establish policy in areas for which it has no authority. Additionally, it is not clear how SCAG would fund the work efforts because they are not directly related to its mission and, therefore, do not have funding. For example, MM-PS 118 states: “SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches and models and to specify levels of performance for regionally significant projects to be consistent with regional plans.” Green building practices and energy efficiency measures are already addressed by various state and federal agencies, as well as by other local organizations. Further, SCAG does not have the authority to specify levels of performance for land use or buildings.

**SCAG Authority Recommendation: Remove the following mitigation measures for SCAG which it does not have purview for under the law or directed to do by the Regional Council through policy direction. List may not be exhaustive.**

MM-BIO/OS 44	MM-LU 42	MM-LU 77	MM-PS 68
MM-BIO/OS 45	MM-LU 47	MM-LU 80	MM-PS 71
MM-BIO/OS 46	MM-LU 48	MM-LU 81	MM-PS 95
MM-BIO/OS 48	MM-LU 51	MM-LU 82	MM-PS 121
MM-GHG 3	MM-LU 53	MM-LU 83	MM-TR 17
MM-GHG 8	MM-LU 56	MM-NO 12	MM-TR 23
MM-GHG 11	MM-LU 57	MM-NO 16	MM-TR 28
MM-LU 9	MM-LU 60	MM-POP 1	MM-TR 35
MM-LU 21	MM-LU 61	MM-PS 3	MM-TR 83
MM-LU 22	MM-LU 64	MM-PS 14	MM-TR 85
MM-LU 24	MM-LU 65	MM-PS 25	MM-TR 96
MM-LU 26	MM-LU 69	MM-PS 37	MM-W 34
MM-LU 32	MM-LU 71	MM-PS 39	MM-W 59

MM-LU 34            MM-LU 74            MM-PS 41            MM-W 60  
MM-LU 41            MM-LU 75            MM-PS 67            MM-W 65

## **10. SCAG Mitigation Measures**

It would be helpful to understand how SCAG will implement the mitigation measures that it is assigned to do. Many of the mitigation measures will expand SCAG's role into areas that are not currently under its purview and are under the jurisdiction of other entities. Many also constitute significant work efforts.

**SCAG Mitigation Measures Request:** Please explain how the actions and programs required by the measures SCAG is assigned to do would be funded to ensure that they are truly feasible for SCAG to undertake.

## **11. Ensuring Outcomes**

SCAG has limited authority in many of the areas included in the measures and will not be able to ensure impacts are mitigated and that the outcomes identified do actually occur. SCAG can assist, offer information, educate, and provide discussion forums for topics outside its area of jurisdiction; however, it is not possible to "ensure" that outcomes are achieved for things that are outside of its purview.

**Ensuring Outcomes Recommendation:** Remove all references within mitigation measures that SCAG will "ensure" or "shall minimize impacts" that result from a mitigation measures.

**Example:**

**MM-CUL17: ~~"Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG's shall, through cooperation, information sharing and ongoing regional planning efforts such as web-based planning tools for local government including CA lots, and direct technical assistance efforts such as Compass Blueprint's Toolbox Tuesday series, provide information and assistance to local agencies to help them avoid impacts to cultural resources. Resource agencies, such as the Office of Historic Preservation, shall be consulted during this process."~~**

## **12. Fees and Taxes**

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation.

**Fees and Taxes Recommendations:**

- 1. Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. The following list may not be exhaustive.**

MM-BIO/OS55	MM-PS15	MM-TR30	MM-TR88
MM-LU29	MM-PS63	MM-TR37	MM-TR94
MM-LU53	MM-PS75	MM-TR47	MM-TR96
MM-LU54	MM-PS76	MM-TR52	MM-W6
MM-LU80	MM-PS78	MM-TR60	MM-W32
MM-LU81	MM-PS92	MM-TR69	MM-W52
MM-LU82	MM-PS106	MM-TR74	MM-W58
MM-LU83	MM-PS107	MM-TR75	
MM-POP4	MM-PS113	MM-TR80	
MM-PS12	MM-TR28	MM-TR84	

2. Please clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

### **13. Guidance Documents**

Guidance documents are there as information sources for consideration; however, they do not represent regulation or establish standards that are required to be achieved. For example, MM-AQ19 inappropriately indicates that project sponsors should comply with the CARB Air Quality and Land Use Handbook (June 2005) which is only a guidance document.

**Guidance Documents Recommendation: Remove references that indicate a compliance with guidance documents from mitigation measures.**

### **14. Duplicative/Existing Regulations**

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the California Environmental Quality Act, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and the regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that

restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state law, and local laws and regulations.” Similar language is included in some mitigation measures. It is offered that MM-PS 13 is a good example of the type of appropriate language and reads “Project sponsors can and should ensure that projects are consistent with federal, state, and local plans that preserve open space.”

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the California Environmental Quality Act, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and the regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state law, and local laws and regulations.” Similar language is included in some mitigation measures. It is offered that MM-PS 13 is a good example of the type of appropriate language and reads “Project sponsors can and should ensure that projects are consistent with federal, state, and local plans that preserve open space.” The water section provides another example. The PEIR includes 68 mitigation measures in the Water Resources section regarding water quality. At least 35 of these are related to stormwater runoff best management practices (BMPs) that are currently regulated through Municipal National Pollutant Discharge Elimination System (NPDES) Stormwater Permits issued by Regional Water Quality Control Boards. In the SCAG region there are five water quality control boards each with its own Municipal NPDES Stormwater Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project’s applicable Municipal NPDES Stormwater Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the mitigation measures regarding specific BMPs should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Stormwater Permit.

**Duplicative/Existing Regulations Recommendations:**

1. **Please remove all mitigation measures listed in Attachment 1 which are duplicative of existing regulations administered by or under the jurisdiction of other agencies. The list may not be exhaustive.**
2. **For each impact, please add the following language: “Local jurisdictions, agencies, and project sponsors should comply, as applicable, with existing federal, state, and local laws and regulations.”**

## **15. Draconian Mitigation Measures**

Many of the mitigation measures in the Draft PEIR are draconian and need to be removed. One prime example is MM-LU 85. It reads in part “Local jurisdictions can and should reduce heat gain from pavement and other hardscaping including: Reduce street rights-of-way and pavement widths to World War II widths (typically 22 to 34 feet for local streets and 30 to 35 feet for collector streets curb to curb)...” Although reduced street widths may be appropriate in some cases and have been implemented in many jurisdictions, it is inappropriate and counterproductive to require reduced street widths as a mitigation measure in the PEIR. Reduced street widths, for example, generally do not provide space for on-street parking which may result in greater, additional paved areas provided in separate parking lots. A second example is MM-LU15: “Project sponsors can and 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 transportation projects/improvements.” Measures should support the SCAG Energy and Environment Committee which recommended that the programs build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA’s Measure M Mitigation Program, and TCA’s open space mitigation program, which has protected 2,200 acres in perpetuity to date. Open space conservation should be pursued in a voluntary manner, working with willing private sector landowners and not overly prescriptive and specific.

**Draconian Mitigation Measures Recommendations: Remove mitigation measures that are very prescriptive, such reducing street widths to WWII widths or specifying preferred technology.**

In addition to the above comments, detailed technical comments, language changes, and questions on the RTP/SCS, Appendices, and PEIR documents are included in Attachment 2.

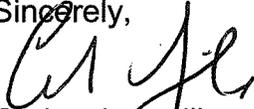
## **Conclusion**

We recognize the immense efforts it took to prepare these documents. They are incredibly complex documents establishing important and far-reaching policy for the region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents and hope that preparation of future RTP/SCS documents will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline of document releases, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because

the timeline does not allow for recirculation or full discussion of requested changes. The documents were released over the holiday season and included the release of draft PEIR document on December 30, 2011. The minimum 45-day public comment period closes on February 14, 2012. Only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 4, 2012.

We appreciate your consideration of all of the comments provided in this letter and its attachments and look forward to your responses. It is a shared goal to have an RTP/SCS adopted that is credible and defensible on all levels. .

Sincerely,



Carlos Jaramillo

Deputy Director of Community Development

cc: Don Hanna, City Manager  
Jennifer Cervantez, Assistant City Manager  
Michael Haack, Director of Community Development  
Chris Johansen, City Engineer  
Roy Ramsland, Planning Manager

**Attachment 1: Mitigation Measures Duplicative of Existing Regulation**  
 (Listed by type of regulation measures duplicates)

<b>Air Quality/AQMD</b>	<b>CDFG</b>	<b>Federal &amp; state law</b>	<b>Federal law</b>	<b>Resource agencies</b>
MM-AQ1	MM-BIO/OS1	MM-HM3	MM-LU14	MM-TR33
MM-AQ2	MM-BIO/OS3	MM-HM4	MM-LU30	MM-BIO/OS29
MM-AQ3	MM-BIO/OS4	MM-HM5		MM-BIO/OS30
MM-AQ4	MM-BIO/OS8	MM-HM6		MM-BIO/OS31
MM-AQ5	MM-BIO/OS10	MM-HM7	<b><u>NPDES</u></b>	MM-BIO/OS32
MM-AQ6	MM-BIO/OS11	MM-LU28	MM-AQ16	MM-BIO/OS33
MM-AQ7	MM-BIO/OS17	MM-NO18	MM-BIO/OS19	MM-BIO/OS34
MM-AQ8	MM-BIO/OS18	MM-PS13	MM-GEO5	MM-BIO/OS35
MM-AQ9	MM-BIO/OS21	MM-W36	MM-W1	MM-BIO/OS50
MM-AQ10	MM-BIO/OS22	MM-W37	MM-W13	MM-BIO/OS51
MM-AQ11	MM-BIO/OS23	MM-W38	MM-W58	
MM-AQ12	MM-BIO/OS24			
MM-AQ13	MM-BIO/OS25		<b><u>Flood control</u></b>	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		<b><u>Local Agencies</u></b>	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
<b><u>State law</u></b>				
MM-AV3	MM-HM10	MM-PS4	MM-PS107	MM-W25
MM-AV6	MM-HM11	MM-PS8	MM-PS113	MM-W26
MM-AV12	MM-HM12	MM-PS10	MM-PS119	MM-W27
MM-BIO/OS20	MM-HM13	MM-PS12	MM-PS122	MM-W28
MM-CUL1	MM-HM14	MM-PS14	MM-TR29	MM-W29
MM-CUL2	MM-HM15	MM-PS16	MM-TR49	MM-W30
MM-CUL3	MM-HM16	MM-PS35	MM-TR55	MM-W31
MM-CUL4	MM-LU10	MM-PS36	MM-TR75	MM-W32
MM-CUL5	MM-LU11	MM-PS37	MM-TR89	MM-W39
MM-CUL6	MM-LU17	MM-PS42	MM-W6	MM-W43
MM-CUL7	MM-LU19	MM-PS43	MM-W8	MM-W46
MM-CUL8	MM-LU20	MM-PS48	MM-W9	MM-W47
MM-CUL9	MM-LU38	MM-PS55	MM-W10	MM-W48
MM-CUL10	MM-LU43	MM-PS56	MM-W11	MM-W49
MM-CUL11	MM-LU44	MM-PS57	MM-W12	MM-W50
MM-CUL12	MM-LU48	MM-PS59	MM-W15	MM-W51
MM-CUL13	MM-LU58	MM-PS61	MM-W16	MM-W52

MM-CUL15	MM-NO1	MM-PS67	MM-W17	MM-W54
MM-CUL16	MM-NO4	MM-PS69	MM-W18	MM-W55
MM-GEO1	MM-NO8	MM-PS71	MM-W19	MM-W56
MM-GEO2	MM-NO9	MM-PS73	MM-W20	MM-W61
MM-GEO3	MM-POP2	MM-PS77	MM-W21	MM-W62
MM-GEO4	MM-POP4	MM-PS89	MM-W22	MM-W64
MM-GEO6	MM-PS1	MM-PS92	MM-W23	MM-W66
MM-HM9	MM-PS2	MM-PS97	MM-W24	MM-W68

Attachment 2: Additional Technical Clarifications on documents are also offered as follows:

**2012 RTP/SCS**

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
1	General Comment	all	<i>All chapter headings should include the Chapter number on each page for ease of reference.</i>
2	Clarification	1, left column	"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to <u>comply with SB 375, both</u> improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. As
3	Clarification	4, right column	"This region needs a long-term, sustainable funding plan that <u>ensures the region receives its fair share of funding,</u> supports an efficient and effective transportation system that grows the economy, provides mobility choices, and improves our quality of life."
4	Clarification	page 7- Table 2 and page 95- Table 3.3	<i>Is additional \$0.15 gas tax the sum total of both state and federal taxes or \$0.15 each?</i>
5	Clarification	40, left column	"Strategic investments, <u>put forth by the private sector,</u> that would remove barriers associated with telecommuting are expected..."
6	Correction	page 42- Table 2.2	241 toll road completion year is <u>2030</u>
7	Please define in the text and add to a glossary	50, left column	"scrip"
8	Clarification	54, right column	"Express/HO T Lane Network Despite our concerted effort to reduce traffic congestion through years of infrastructure investment, the region's system demands continue to exceed available capacity <u>during peak periods.</u> "
9	Clarification	70, 78	Greenhouse Gases and Air Quality SCAG seems to rely on CEQA to achieve the "maximum feasible" reductions in emissions from transportation. However, this is not consistent with the intent of SB 375's goal of achieving specific thresholds of 8% by 2020 and 13% by 2035 through a sustainable communities strategy plan.  <i>Please provide clarification to this section indicating if the air quality and greenhouse gas CEQA</i>



#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>what would occur naturally. However, it is stated in the RTP that the population, housing, and employment growth totals are fixed and only the distributions may change based on the plan. This means there will not be “new” growth and that the RTP and SCS may simply influence and shift the growth anticipated for the region. This moving of growth is the result of changes in distribution that are due to changes in land use or densities. Because of this, it is requested that references to “induced growth” be reworded to reflect the shifting of growth in the region.</p> <p><i>Recommended text change: “Cumulative impacts from the projected growth <u>induced by the RTP</u> include increased impervious surfaces;...”</i></p>
12	Clarification	Chapter 3	<p>SCAG’s Financial Plan includes a significant portion of “New Revenue Sources and Innovative Financing Strategies” that are not currently in place or available. While some of the proposed revenues are within the control of SCAG or MPOs and County Transportation Commissions, the majority of the revenues (in terms of dollars) require either state or federal action to implement.</p> <p><i>Please explain what the implications are if these new revenue sources and innovative financing strategies do not become available?</i></p>
13	Clarification	page 95- Table 3.3	<p><del>“Mileage-based user fees would be implemented to replace gas tax and augment estimated at about \$0.05 (2011\$) per mile and indexed to maintain purchasing power starting 2025.”</del></p> <p>Suggested language is from page 31 of Growth Forecast Appendix:  <u>“Current gasoline tax, estimated at about \$0.05 (2011\$) per mile will increase through 2025, then in 2026 it would be replaced with a mileage-based user fee indexed to maintain purchasing power.”</u></p>
14	Clarification	105, right column	<p><del>“While the region was once known worldwide as the “capital of sprawl,” the region today <u>is projecting growth on only a small fraction of the has little raw land available in the region left to accommodate additional growth.</u>”</del></p>
15	Clarification	105, right column	<p><del>“While the region was once known worldwide as the “capital of sprawl,” the region today <u>is projecting growth on only a small fraction of the has little raw</u></del></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			land <u>available in the region left to accommodate additional growth.</u> "
16	Clarification	106	<p>SCAG indicates that the OC SCS has been incorporated into the regional SCS. OCCOG was one of two subregions that undertook the arduous task and obligation of preparing an SCS.</p> <p><i>Please add clarifying text that these subregional SCSs, including the OC SCS, represent the Sustainable Communities Strategies applicable to those subregions.</i></p>
17	Clarification	110, right column	<p>"Municipal water and sewer systems, for example, ensure clean water. At the same time, <del>concrete stormwater runoff channels harm water quality and sprawl eats into open space</del> as areas become more urbanized and the percentage of impervious surface is increased, the hydrologic regime is <u>dramatically altered. Drainage conveyances that once were natural and riparian are required to be engineered as hardened flood control channels to provide adequate protection of private property and public infrastructure from the increased frequency, duration, peak flow, and overall volume of stormwater runoff. With this armoring of once natural channels, water quality benefits from biofiltration are lost along with opportunities for infiltration and evapotranspiration, which can lead to hydromodification downstream in sections which are not yet engineered and hardened. Many strategies...</u>"</p>
18	Clarification	112, 117	<p>The SCS documents the development of four scenarios to explore basic aspects of future growth. These scenarios were used in public outreach and the SCS and the associated Appendix states that "Using the public dialogue and feedback from the analysis of the SCS Scenarios, SCAG developed the 2012 RTP/SCS Plan alternatives." (Similar references are also include at RTP/SCS p. 117, and SCS Background Documentation p. 71). The RTP/SCS and Appendix then describes a process that led to the Plan alternatives. Neither the RTP/SCS, Appendix or PEIR expressly state or illustrate the fundamental land use and socioeconomic foundation for the SCS.</p> <p><i>In order to confirm consistency with the OC SCS, it is requested that SCAG include appropriate tables,</i></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<i>graphics and maps that provide the detail that confirm this consistency.</i>
19	Clarification	113, 122	<p>The regional SCS states that the scenarios/alternatives were developed using the Local Sustainability Planning Tool (LSPT). The LSPT is a sketch planning tool that flattens geographical areas to a 5-acre grid cell. The OC SCS land use data was provided at much greater level of detail in that specific parcel data and detail were provided by each jurisdiction. A cursory review of some LSPT data reveals inconsistencies regarding interpretation of Orange County land uses.</p> <p>It is acknowledged that the regional SCS states, "Land use inputs for OCCOG SCS were unchanged". Yet use of the LSPT and SCAG Development and Community Types presented in the SCS leave open the question as to whether the OC SCS was altered, as noted above.</p> <p><i>Please provide confirmation that the underlying OC SCS land use data was used without significant alteration and LSPT flattening and interpretation in the development of the regional SCS Plan and alternatives.</i></p>
20 17	Add to glossary	127, right column	"Gentrification"
21	Clarification	128, left column	<p>"Thus, this adjustment allowed the land use pattern to conform more closely to local <u>expectations general plans</u>, while reducing the amount of vehicle miles traveled."</p> <p><i>Whose/What are "local expectations?"</i></p>
22	Clarification	149, right column	<p><i>Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.</i></p> <p>"The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders <u>may use or consider while preparing specific projects which would help can and should undertake in order</u> to successfully implement the SCS."</p>
23	Clarification	150-152	The OC SCS was accepted by SCAG and represents the set of strategies and the growth distribution that outlines the best approach for how

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			<p>the requirements of SB 375 would be met within the subregion. Specifically, the OC SCS included 15 specific Sustainability Strategies, reflecting a menu of 222 practices and actions that OC agencies have agreed to pursue (or continue to pursue) to achieve GHG reductions that support SB 375.</p> <p><i>Why doesn't the regional SCS specifically acknowledge these 15 strategies yet include other strategies and performance measures not included in the OC SCS (e.g., Locational Efficiency)?</i></p>
24	Add to glossary	166, right column	"Greenfield"
25	Clarification	194, right column	"In addition to these targeted outreach efforts, all regular and special meetings of the RTP task forces, the Transportation Committee (TC), <u>the CEHD</u> , <u>the EEC</u> , and the SCAG Regional Council are publicly noticed and ..."
26	Clarification	201	<i>Please clarify whether the text stating "Long-term emission reduction for rail, with a goal of zero-emissions rail system" is intended to reflect a zero-emissions freight rail system, or whether this goal also applies to passenger rail.</i>
27	Clarification	202, 203- Table 7.1	<p>Unfunded operational improvements, of which several are listed on page 203, Table 7.1, include transit station improvements in Irvine, Fullerton, and Santa Ana, bus rapid transit (BRT) in Orange County, and high speed rail (HSR) Phase II.</p> <p><i>Please confirm that these are consistent with the OC SCS.</i></p>
28	Clarification	207	<p>Strategic Finance</p> <p><i>Please explain what will happen if reasonably foreseeable revenue sources of approximately \$200 million do not become available?</i></p>
29	Add to glossary	205	"Active transportation"

#### **GROWTH FORECAST APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Updated growth forecast numbers	23, Table 13	In December 2011, Orange County provided SCAG with the revised growth forecast dataset, OCP-2010 Modified, per the OC SCS MOU (official OCCOG Board action 1/26/2012).

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<i>Please incorporate revised Orange County numbers (i.e. OCP-2010 Modified) into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.</i>

### PERFORMANCE MEASURES APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	1	<p>The document states, "The performance measures are used to evaluate how well the RTP/SCS addresses the adopted goals and performance outcomes."</p> <p><i>Is there any formal role for the performance measures?</i></p> <p>ARB will evaluate for SB 375 compliance not based on these measures but based on ARB process.</p> <p><i>Please include language clarifying that this is a requirement to demonstrate compliance with federal requirements and not for the obligations under SB 375.</i></p>
2	Clarification	1, end of first paragraph	<p>Add statement: "<u>Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.</u>"</p>
3	Clarification	1, column 2	<p>The document states, "The Regional Council will formally adopt the goals and outcomes as part of the final 2012 RTP/SCS."</p> <p><i>Does this bring any formal obligation to meet goals? Goals are general, flexible, and aspirational rather than specific, as on p.1.</i></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Clarification	13, Table 8	<p>The RTP/SCS claims an extra 2% CO2e emissions reduction in 2035 from the NHTS post-processing analysis. While the RTP/SCS meets the ARB SB375 goal without the extra 2%, we would like to note that the extra 2% could be important if the attorney general raises concerns about backsliding. Consequently, the reliability of the extra 2% reduction should be checked. Questions on the NHTS model are below.</p> <p>It would be useful to know the answers to better judge the quality, although we do note that the report does look like it meets the standards or best practice.</p>
5	Clarification	9	<p>NHTS Model Documentation Report</p> <p><i>Are the auto and bus accessibility variables included in the regression models for 30-mile rings?</i></p> <p><i>In "Number of trips" model – is number of cars, included as an independent variable, the actual or predicted value?</i></p> <p><i>The same question applies to other models.</i></p>
6	Clarification	23, Table 10	<p>NHTS Model Documentation Report</p> <p><i>Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample?</i></p>
7	Clarification	24, Test 3	<p>NHTS Model Documentation Report</p> <p>(Compare Trip-Based and NHTS Model): The final test was to compare the results of the Trip-Based Model and the NHTS Model for the same scenarios.</p> <p><i>Please describe the scenarios tested.</i></p>

#### TRANSPORTATION FINANCE APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	General	<p><i>What are the implications if revenues other than core revenues do not become available?</i></p> <p><i>Please describe any implications to the ability of the region to meet SB 375 GHG emission reduction targets or the federally required air quality</i></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			<i>conformity?</i>

**SCS BACKGROUND DOCUMENTATION APPENDIX**

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Please define	53, right column	Housing Options and Mix:  Define Larger-lot single family in text
2	Clarification	71-74, 80-83	Alternatives naming: A, B, C  Names of Alternatives differ than those listed in the PEIR on pages ES-3 and 1-4.  <i>Please be consistent with naming protocol for alternatives between two/all documents.</i>
3	Revise language to clarify	71, right column	“Plan Alternative (B) ... The alternative maintains city-level forecast control totals for both households and jobs, however, within city boundaries shifts are made to focus a much larger share of future growth in a more compact way around HQTAs, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u> Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family <u>housing housing.</u> ”
4	Please define	71, right column	Plan Alternative (B)  Define small lot single family in text
5	Revise language to clarify	71, right column	Plan Alternative (C) “As a result very suburban communities may experience no new <u>housing or employment</u> growth, while some urban areas with very good access to regional transit may experience significant increases in <u>housing or employment</u> growth.”
6	Revise language to clarify	72, left column	“While each alternative is distinctive, a number of parameters remained constant across each alternative: the regional RTP/SCS forecast total for <u>population, households and jobs;...</u> ”  “Detailed forecast: the detailed distribution of <u>population, households, and jobs</u> across the region...”

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
7	Revise language to clarify	72, Table D1	<p>Alternatives A &amp; B:  “Controlled to TAZ-based RTP/SCS Forecast for 2020; Controlled to city-level RTP/SCS Forecast for 2020-2035, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u>”</p> <p>Add statement to table notes: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>
8	Revise language to clarify	74, Table D2	<p>Alternatives A &amp; B:  Add statement: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>
9	Clarification	75, right column	<p>“Development Types  The alternatives are built on, and provides data at, the level of the TAZ, which includes housing units and employment.”</p> <p><i>Please clarify if TAZ is Tier 1, Tier 2, or both.</i></p>
10	Revise language to clarify	79, right column	<p>“Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected <u>unchanged</u> and integrated into the alternatives (with possible revisions for Alternative C only).”</p>
11	Clarification	79	<p>The section includes the following language:  “Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected and integrated into the alternatives (with possible revisions for Alternative C only).”</p> <p><i>Please clearly indicate what the “possible revisions” are and what process would be used to coordinate with Orange County should changes to the socioeconomic data contained in the OC SCS be proposed?</i></p>
12	Revise language to clarify	80	<p>Alternative A  Add statement: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
13	Revise language to clarify	81	<p>Alternative B</p> <p>It is not clear whether Alternative B is the SCS land use plan. If it is, statements in the appendix lead one to believe the OC SCS foundation has been altered. For example, adjustments made to land uses to locate proximate to High Quality Transportation Areas (HQTA) and intensification of residential and employment development in HQTA that diverge from local General Plans as well as implementation of a vehicle user fee are not part of the OC SCS.</p> <p><i>Is Alternative B the SCS land use plan?</i></p> <p><u>Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u></p>
14	Clarification	115, left column	<p>Transit Zoning Code Santa Ana 2011</p> <p><i>Is this a duplicate of the 2010 Santa Ana project?</i></p>

**PEIR**

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	Revise language to clarify	ES-2	<p>ES contains matrix of mitigation measures which reference project sponsors, local agency, and project implementation agency without definitions. Add definitions into ES at end of ES.1:</p> <p><u>In general, the terms “local agency,” “project sponsor” and “project implementing agency” are used throughout this PEIR to identify agencies, organizations, companies and individuals that will act as lead agencies or project applicants for different types of individual projects. Individual projects that are anticipated to occur pursuant to the 2012-2035 RTP/SCS consist of planning projects (general plans, specific plans, climate action plans, etc.), development projects (including Transit Priority Projects (TPPs) and other similar projects), and transportation projects.</u></p> <p><u>In general, “local agency” is used to refer to a public agency that would propose a planning project or a public infrastructure project and/or an agency that would be lead agency for individual projects. “Project sponsor” is typically used to refer to an applicant (that could be public or private, an organization or an individual) that proposes a project. “Project implementing agency” is used to refer to an agency responsible for implementing a project. In this document, project-implementing agencies are those that are responsible for carrying out (reviewing, approving, constructing) transportation projects.</u></p>
2	Clarification	ES-3, 1-4, Chapter 4	<p>Alternatives’ Naming: No Project Alternative, Modified 2008 RTP Alternative, Envision 2 Alternative; Alternatives 1, 2, 3</p> <p>Names of Alternatives differ than those listed in the SCS Background Documentation appendix on pages 71-74 and 80-83.</p> <p><i>Please be consistent with naming protocol for alternatives between all documents.</i></p>
3	Fix numbering	ES-31	Duplicate naming of GHG11 and GHG12
4	Please define	ES-42	LU63- What are the smart growth principles?

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
5	Please define	ES-42	LU64- What are the benchmarks for smart growth?
6	Fix numbering	ES-51	PS17 & PS18 are missing
7	Fix numbering	ES-53	Duplicate naming of PS36 & PS37
8	Please define	ES-67	TR 34- what are the identified transportation benchmarks?
9	Please define	ES-83, 3.13-42 MM-W43	Define climate change hydrology
10	Please define	ES-40, 3.8-21 MM-LU42	Define urban growth boundary
11	Please define	ES-57, 3.11-49 MM-PS68 & ES-74, 3.12-43 MM-TR96	Define parking cash out program/ cashouts
12	Clarification	1-5	<i>Besides IGR, what other monitoring efforts is SCAG in charge of? (that would require lead agencies to provide SCAG with documentation of compliance with mitigation measures)</i>
13	Language correction	1-6, paragraph 3	Language correction: "The latter <b>former</b> finding..."
14	Language correction	2-5	Sustainability section should be separated.  Language correction: <b>Sustainability.</b> The 2012-2035 RTP/SCS is subject to specific requirements for environmental performance.  <b><u>New paragraph:</u></b> "Beyond simply meeting these requirements, a ..."
15	Language correction	2-5, Table 2-2	"Align the plan investments and policies with <b>while</b> improving..."
16	Please define	2-14	Define "scrip"

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
17	Narrative	2-21	<p>AB 32 is global warming solutions act. SB 375 was determined to be stand-alone legislation. RTP document is not forum to address global climate change and references distract from RTP goal and purpose. "Global warming" and "global climate change" are not interchangeable phrases. References should be removed or, where appropriate, language should be changed to "global warming".</p> <p><del>Goods movement is also a major source of GHG emissions that contribute to global climate change.</del></p>
18	Clarification	2-27 paragraph 4	<p>Not in SCAG's authority, nor funding available. Delete sentence:  <del>SCAG will work with local jurisdictions and community stakeholders to seek resources and provide assistance to address any possible gentrification effects of new development on existing communities and vulnerable populations.</del></p>
19	Clarification	2-27 paragraph 5	<p>"The 2012-2035 RTP/SCS land use development pattern accommodates over 50 percent of new housing and employment growth in HQTAs, while keeping jurisdictional totals consistent with local input."</p> <p><i>Please confirm that there are no changes to the local land use inputs provided by Orange County.</i></p>

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	2-29	<p>“For purposes of SCAG’s SCS, a Development Type reflects an estimated average density of 22 residential units per acre. However, it is important to note that the designation is a potential ultimate average for the TAZ—and is not an absolute project-specific requirement that must be met in order to determine consistency with the SCS. In other words, the SCS was not developed with the intent that each project to be located within any given TAZ must exactly equal the density and relative use designations that are indicated by the SCS Development Type in order for the project to be found consistent with the SCS’s use designation, density, building intensity and applicable policies. Instead, any given project, having satisfied all of the statutory requirements of either a residential/mixed-use project or TPP, may be deemed by the lead agency to be consistent with the SCS so long as the project does not prevent achieving the estimated average use designations, densities and building intensities indicated by the Development Type within the TAZ, assuming that the TAZ will be built-out under reasonable local planning and zoning assumptions.”</p> <p><i>Does the above PEIR language create a requirement for average TAZ density levels in 2035 and a requirement that each local project not preclude those density levels?</i></p> <p><i>Additionally, please clarify whether in HQTAs, these densities could be exceeded as well as implications of an area that is already fully developed not redeveloping such that it ever achieves the identified densities.</i></p>
21	Please define	3.8-5 paragraph 3,	Define “open space”

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
22	Revise language to clarify	4-39	<p>Envision 2 alternative contains growth projections that would place housing in flight paths, locate housing on sites for which housing is not allowed due to environmental contamination, would significantly impact existing industrial operations necessary to maintain quality jobs in the region, and does not include development projects that are legally allowed due to having existing entitlement for development. Because this alternative does not consider the existing health and safety of future residents nor the existing legal approvals of development in the region, it is not possible to determine if the alternative is actually superior to other alternatives. It is simply another alternative for consideration.</p> <p><i>Please remove references to the Envision 2 (or any other name of this alternative) as being environmentally superior.</i></p> <p><del>ENVIRONMENTALLY SUPERIOR</del> <u>ENVISION 2 ALTERNATIVE</u></p>
23	Revise language to clarify	4-40	<p>"Of the three alternatives, the Envision 2 Alternative would be considered <u>by State CEQA guidelines as the environmentally superior alternative</u> because it does not allow further use of land for single-family development..."</p>



Susan D. Harrington, M.S., R.D.  
Director

February 14, 2012

President Pam O'Connor and Members  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

02/14/12  
Feb 23 2012  
Random Call Telephone  
of Governor's Office

Dear President O'Connor and Regional Council Members:

The Riverside County Department of Public Health thanks the Southern California Association of Governments (SCAG) staff for their hard work on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and for recognizing that the decisions made in the planning process ultimately affect Public Health. While we believe the draft plan under review has many positive elements, we also believe strengthening measures are needed to assure that strong public health benefits are achieved through the plan.

The serious air pollution and health problems experienced in the Southern California region require strong action to transform transportation and land use planning. The Los Angeles region continues to be rated as the most polluted area for ozone in the country by the American Lung Association and the public health toll remains high. The Inland Empire continues to bear the brunt of this pollution due to weather patterns that concentrate pollution in the area leading to more severe health impacts.

The research by the American Lung Association in California shows that the six-county Southern California region could avoid over \$16 billion in cumulative health and societal costs through smart growth strategies that reduce the growth in the region's vehicle trips by 20 percent by 2035.

We offer the following comments and recommendations to ensure that the Sustainable Communities Strategy and future transportation investments place sufficient emphasis on promoting active transportation modes and transit oriented development, measuring and improving health progress, and ensuring that health and equity are imbedded in the decision making process for this plan and future planning efforts.

#### **Key Health Recommendations for SCAG SCS**

- **Improve Assessment of health benefits through new modeling approaches.** Utilize the new California Department of Public Health I-THIM screening tool to analyze the potential chronic disease reductions that can be achieved in the SCAG region based on increased transportation-related physical activity such as walking and biking. This model was used in the San Francisco Bay Area region to determine reductions in heart and respiratory disease, breast cancer and other health effects linked to active transportation scenarios. We urge SCAG to incorporate this tool in regional planning and decision making for transportation investments.
- In addition to monitoring premature mortality, SCAG should also assess reductions in asthma incidence and exacerbations due to traffic related pollution (NOX) and other targets through collaboration with local health departments, the South Coast Air Quality

Management District, academic researchers and community based organizations.

Improvements to the targets should be monitored and reported to the public every two years.

- **Focus investments on completing transit systems** and building out transit infrastructure, rather than highway expansion, including the following:
  - Doubling Metrolink ridership by 2020 and double it again by 2035
  - Expanding Bus Rapid Transit and regional bus service
  - Enhancing TOD planning and 1<sup>st</sup>-mile-last-mile investments near Metrolink stations
  - Doubling the bicycle network to 24,000 miles and improving pedestrian environment
- **Increase transit and transit oriented planning in Inland Empire.** Because so much of the planned growth in the Inland Empire is relatively low density and remote from transit, SCAG should work closely with Inland Empire governments to accelerate expansion and frequency of transit and rail to the area and focus more growth around transit corridors.
- **Front load active transportation funding.** SCAG should commit to a higher amount of transportation funding for bike and pedestrian infrastructure, especially in the early years of the 25-year RTP process. SCAG should work with local transportation agencies to prioritize bicycle and pedestrian projects and ensure the majority of funds are spent prior to 2020.
- **Increase investments in zero emission freight transportation** in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards. Ensure that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies and infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially those living along the freight corridor.
- **Evaluate the number and type of new developments** that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP. Work with air district, health departments and universities to develop and implement best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.

We appreciate the opportunity to be part of the RTP/SCS process and look forward to working with SCAG in the future. If you have any questions regarding this letter, please contact me at 951-358-5074 or email [mosur@rivcocha.org](mailto:mosur@rivcocha.org)

Sincerely,



Michael Osur,  
Deputy Director of Public Health

Cc: Bonnie Holmes Gen, American Lung Association in California



**SCAG**

**FEB 21 2012**

**MAIL RECEIVED**

February 14, 2012

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

**RE: Draft RTP/SCS and Draft PEIR**

Dear Mr. Ikhata:

The City of Stanton appreciates the opportunity to comment on the 2012-2035 Draft Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR) and associated appendices. As a member city of the Orange County Council of Governments (OCCOG), the City would like to extend its support of the OCCOG response letter regarding the subject documents in its entirety. In addition, the City would like to provide the following comments regarding the RTP/SCS and PEIR:

It is requested that SCAG continue to utilize growth projection data at the County level as it has done in previous RTP processes. The growth projections for the 2012 RTP identify population, housing and employment data for the six-county SCAG region, from 2008 (existing) to 2020 and 2035. These growth projections represent the best available information from local jurisdictions, the business community and landowners. However, as time passes, what is feasible for any given project can change. The triggers for change to adopted growth projections can range from factors such as market conditions, new information or data, infrastructure availability, changes in funding availability (such as the dissolution of redevelopment agencies statewide), and changes to jurisdictional boundaries resulting from future annexations and incorporations of previously-designated unincorporated territory. SCAG should continue to adopt the growth projections for the 2012 RTP at a countywide level, consistent with past approvals of Regional Transportation Plan growth forecasts. County level geography accommodates internal adjustments to changing conditions as described above, without compromising the integrity of the overall growth projections. However, approving the growth projections at any lower level of geography, such as at the city level, would be challenged with continual revisions and shifts to the total number of housing, population and employment within a city, among cities, and between cities and counties as a result of the factors described above. Adoption of the data at a level lower than the county

would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which the RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the RHNA allocations must be consistent with the RTP/SCS; state law does not require that they be identical. The RTP/SCS can be adopted at the county level and the RHNA process may proceed independently until it is completed after the appeals, trades, and transfers are completed. The RHNA allocations that were derived from the growth forecast can still be determined to be consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.

In regards to the Projection data utilized in the RTP/SCS and the PEIR, on January 26, 2012, the update to the Orange County Projection (OCP-2010) dataset known as "OCP-2010 Modified" was officially approved by the OCCOG Board of Directors and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this letter also serves as the formal notice of the update that should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.

As part of the SCAG SCS, it was indicated that the OC SCS was incorporated in its entirety without modification. However, there are strategies in the Orange County SCS that are not included in the regional SCS. Similarly, there are some strategies in the regional SCS that are not consistent with the strategies in the OC SCS. This creates confusion and clarification is needed. Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional SCS's that SCAG is then required to incorporate into the regional SCS. In Orange County, the Orange County Council of Governments (OCCOG) and the Orange County Transportation Authority (OCTA) developed a countywide or subregional SCS (OC SCS) that was to be incorporated in whole into the SCAG SCS. SCAG has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the regional SCS, but it is unclear what the standing is of the OC SCS. The OC SCS contains a set of strategies that were agreed upon by local governments, agencies and other stakeholders within Orange County and was accepted by SCAG and should represent the SCS that is applicable to the Orange County region. Please clarify the roll of the OC SCS in the regional SCS, and when there are inconsistencies in the regional SCS and the OC SCS, whether the OC SCS would be the prevailing document for the Orange County subregion.

In the Mitigation Monitoring Program, it is stated that "Lead Agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process." However, it is unclear how SCAG intends to implement the Mitigation Monitoring Program with regard to the proposed mitigation measures, as may be implemented by local agencies. In addition, it is infeasible for SCAG to require local jurisdictions to report when such mitigation measures are considered for any project. Noting that the SCAG region includes 6 counties, 14 subregional entities and 191 cities, this reporting requirement would surely fall short of expectations. Given this identified infeasibility, please clarify what obligations local agencies may have regarding SCAG's mitigation monitoring efforts.

On pages 1-5 and 1-7 in the introduction of the PEIR, the language should reflect that Lead Agencies will determine the feasibility and applicability of measures and that the measures are intended to offer a menu of options available should a lead agency opt to utilize them. The PEIR makes the assertion on page 1-7 of the Project Description under the Transportation Project Mitigation and Land Use Planning and Development Project Mitigation sections that the draft PEIR has made a preliminary determination that all of the mitigation measures in it are considered feasible. SCAG has not identified any analysis that supports the feasibility of the mitigation measures that are to be undertaken by entities other than SCAG and SCAG staff has stated on numerous occasions that the mitigation measures were intended to be a menu of options for consideration by lead agencies.

As indicated in the PEIR on page 1-6, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rests with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies' regulatory measures. The City recognizes that SCAG's use of the words "can and should" are derived from CEQA, at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitations of SB 375 upon respective local agencies' land use authority, any language seemingly imposing affirmative obligations contrary to SB 375 is inappropriate. As such, the use of the language "can and should" for mitigation measures addressed to local agencies is inappropriate and should be modified to clearly reflect the mitigation measures as a menu or toolbox for implementation where determined feasible by the local agencies.

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation. As such, any mitigation measure that indicates local agencies should implement new fees should be reworded to indicate the imposing of fees is only an option as a way to implement the mitigation measure.

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the California Environmental Quality Act, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact, and the mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA.

In regards to overall document consistency, the alternatives in the PEIR should be consistently named. Throughout the document, the alternatives are identified with numbers (e.g. Alternative 1, 2, or 3), with letters (e.g. Alternative A, B, or C), or specific names (e.g. Envision 2).

Finally, there are several mitigation measures proposed which may not be applicable to certain projects or local agencies. As such, for project specific mitigation measures, or mitigation measures assigned to local agencies, the mitigation measures should be reworded to include the wording "if applicable."

If you have any questions regarding this matter, please feel free to contact Kelly Hart of my staff at (714) 890-4228.

Sincerely,

A handwritten signature in black ink, appearing to read "Omar Dadabhoy". The signature is fluid and cursive, with a large initial "O" and a long, sweeping tail.

Omar Dadabhoy

Community Development Director

February 14, 2012

**SCAG**  
FEB 21 2012  
MAIL RECEIVED

Hasan Ikhata  
Executive Director  
Southern California Association of Governments  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Re: Comments on the Drafts of the 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR)

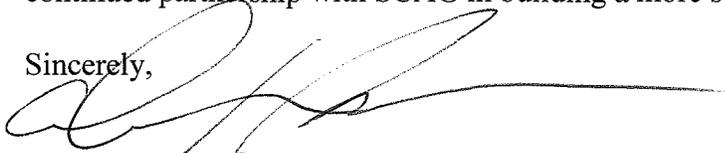
Dear Mr. Ikhata:

Southern California Edison (SCE) values the opportunity to provide comments on the PEIR and RTP/SCS. As an electric utility and infrastructure provider, SCE understands the importance of long-term planning to ensure safe, reliable and affordable service. SCE recognizes SCAG's immense effort in working with multiple stakeholders within the region to develop this plan and appreciates having been included in this process.

The RTP/SCS sets out long-term goals to meet mobility, housing, sustainability and economic needs of Southern California, which are accomplished by transportation agencies and stakeholders. Similarly, SCE will be constructing transmission and distribution projects to maintain and expand its electric system, ensuring long-term reliability and delivering a 33% renewable energy mix for the same growing population. Further, SCAG will play a critical planning role as transportation systems incorporate zero and near-zero emissions technologies, which it has already begun to demonstrate through its leadership on regional electric vehicle infrastructure planning. SCE looks forward to continuing its collaboration with SCAG and other stakeholders to ensure that the land-use, economic and other requirements of sustaining a safe, reliable and affordable electric system are taken into consideration in this and future regional planning initiatives.

Attached are specific comments on the Public Services and Utilities, Air Quality, Green House Gas and Aesthetics sections of the PEIR. Please feel free to contact me at (626) 302-3819 should you have any questions regarding SCE's comments. Once again, SCE appreciates the opportunity to comment on the 2012-2035 RTP/SCS and PEIR and looks forward to its continued partnership with SCAG in building a more sustainable transportation system.

Sincerely,



Alexander Pugh  
Senior Project Manager

CC: Chairwoman Pam O'Connor  
Jacob Lieb  
Margaret Lin

### ***Comments on Section 3.11 Public Services and Utilities:***

#### **Local Energy Partnerships**

Please update page 38 to include all of the active local energy partnerships within the SCAG subregions. In addition to the San Gabriel Valley Energy Efficiency Partnership noted in this section, other partnerships exist with the South Bay Cities COG, Coachella Valley Area Governments, Ventura County, and Cities (Ventura County Regional Energy Alliance) and with the County of Los Angeles.

#### **Growth in the Use of Electric Vehicles**

Assumptions about the number of battery and hybrid plug-in electric vehicles (PEV) in Southern California between now and 2035 may be higher than accounted for within the RTP/SCS and PEIR. Currently, SCE is planning for three scenarios for PEV growth within its service territory by 2020: low - 175,000; medium - 450,000; and High – 1,000,000. In January, the California Air Resources Board passed the Advanced Clean Car Initiative calling for more than one million PEVs in California by 2025. Additionally, planners and researchers in Southern California, including SCAG and the UCLA Luskin Center, are conducting research to guide the build-out of publically accessible charging stations region-wide. This too may further support the growth of the PEV market.

#### **Electric Vehicles Description and Charging**

On page 43-44, please update the description of the status of electric vehicles and charging stations. In 2011, almost 20,000 units of Chevrolet Volt and the Nissan Leaf were sold nationwide according to Automotive News. The US Department of Energy ([www.fueleconomy.gov](http://www.fueleconomy.gov)) indicates that more than a dozen PEV models are slated to come on the market in the next two years. In regards to charging infrastructure, great strides have been made in Southern California to update the older 1990's paddle chargers to the new J1772 standard. Moreover, there are a number of charging station installers and equipment manufactures in Southern California, which means both a direct positive environmental and economic impact comes from electric vehicle growth.

#### **Renewable Energy**

Please note on page 44 in the renewable energy discussion that SCE is investing in hundreds of megawatts of distributed solar generation through a reverse auction mechanism for photovoltaic systems up to 10MW. This is one of many programs that SCE offers to distributed renewables. A more complete listing of SCE incentives can be found on the SCE website: <http://www.sce.com/PowerandEnvironment/Renewables/Solar/default.htm>

#### **Thresholds of Significant Impacts to Utilities**

On page 45, the range of significant impacts to a utility should also include major relocations caused by the any of the projects in the PEIR. Similarly, under the impacts section on page 46, please mention utility relocations caused by projects covered in the PEIR. In addition, please indicate in comparison with the “No Project Alternative” where there would be significant utility relocation impacts.

### **Energy Consumption Projections**

With regards to future energy consumption projections, there are several factors that may increase future electric load growth, including the electrification of transportation systems, which are considered in the RTP itself. Three broad transportation categories that are likely to use more electricity in the study period include light-duty passenger vehicles, bus and rail transit, and multiple modes of goods movement. As an illustration, the PEIR includes projects from Metro’s Measure R building campaign, which include twelve new electric light rail and subway projects during the study period. Eight of these are in SCE’s territory. The PEIR and the RTP/SCS also indicate greater adoption of electric technology within the goods movement sector. The RTP includes zero-emission truck corridors on the I-710 and expansion to an east-west alignment as well as electrification of rail yards operations and routes throughout the region. SCE will work closely with transportation providers to better understand energy needs and air quality benefits of these projects as they come online. However, it is worth noting in the PEIR that these changing conditions will impact long-term demand.

### **SCE Facilities, Rights-of-way and Easements**

The RTP references use of utility right-of-way for open space and transportation improvements. As stated in SCE’s comment letter on the RTP/SCS, SCE will need to coordinate with SCAG and other transportation stakeholders to ensure impacts to SCE’s critical facilities are addressed in order to meet CPUC mandates and to meet the core mission of providing safe, reliable and affordable electricity service to customers within its 50,000- square-mile service territory. Also, the RTP must underscore that the “tiering” provisions of this PEIR does not preclude the requirement that local land use planning decisions be coordinated with SCE to prevent direct and indirect encroachment of residential, commercial and industrial uses with SCE facilities.

Good long-term coordination is critical to building and maintaining functional public services. SCAG, SCE and other service providers throughout the region could benefit greatly by working together on joint corridor planning.

### **Public Service and Utilities Section 3.11 Mitigation Measures**

While it is important for project sponsors to consider energy efficiency, renewable generation, and coordination with utilities during construction, SCE strongly recommends SCAG to direct project proponents to comply with existing regulations and best practices set by regulatory agencies. In the utility sector, these agencies include the Public Utilities Commission (PUC), California Energy Commission (CEC), Southern California Joint Pole Committee (SCJPC), and

many others. Any additional mitigation measures should be provided as optional. It should also be noted that many of the individual project EIRs already include many of the mitigations described in this and other sections. Our specific suggestions include:

MM-PS33 –SCE’s primary responsibility is to provide safe, reliable and affordable service to customers. Trails, parks, and other open space may not be compatible with SCE’s operating requirements or land rights. SCE asks that this mitigation be removed or amended to say, “Coordinate with utilities based on the compatibility of future use.”

MM-PS57 –It is important to coordinate utility relocations to reduce impacts to city streets and other public property and right-of-way. Project proponents should consult impacted utilities early in the planning process and coordinate the environmental review and construction timing of such impacts with the utilities.

MM-PS60 – Prior to considering any renewable energy investments, SCE recommends that project sponsors maximize energy efficiency upgrades.

MM-PS61 – For any of the mitigation measures related to implementing energy efficiency measures, project sponsors should check with their utility to learn about up-to-date best practices and any incentive programs that might be offered. Further, SCE recommends that project sponsors comply with any existing building codes, ordinances, and standards on the best ways to conserve energy.

MM-PS65 – Local jurisdictions should also consider EV readiness education for residents and businesses. There are also several best practices for inclusion of EV readiness building codes for new construction and major remodels, such as those laid out in the California Green Building Standard Codes.

MM-PS70 – Similar to PS61, before installing renewable energy generating equipment, project proponents should maximize energy efficiency upgrades.

MM-PS112 – For all mitigation measures related to local jurisdiction energy efficiency planning, SCE encourages participation in municipal energy efficiency partnerships as mentioned in PS122.

MM-PS120 – SCE encourages SCAG to expand this mitigation to pursue infrastructure planning for PEVs throughout the region in partnership with stakeholders in the private sector, local government, and with planning and regulatory agencies.

### *Section 3.2 Air Quality and 3.6 Green House Gas Emissions*

As stated in the previous section, SCE urges SCAG to consider the net positive impact of electric vehicles to air quality and greenhouse gas emissions in the region. According to the CEC and CARB Alternative Fuels Plan from December 2007, electric cars have a dramatically better well-to-wheels emissions profile than conventional fossil fuel internal combustion engine vehicles;

Carbon dioxide emissions are 72% lower and criteria pollutant emissions are 99% lower. When charging is shifted to off-peak evening hours (more than 80% of SCE EV customers charge off peak), new load from PEVs benefits both the environment and ratepayers. Similar comparisons can be drawn for heavy-duty vehicle use.

SCE comments on specific mitigations in these two sections are as follows:

MM-AQ1 – An additional Transportation Control Measure that should be included from the South Coast Air Quality Management district Rule 2202 is the installation of workplace PEV charging stations.

MM-TR86 – If local jurisdictions are requiring new construction to provide prioritized parking for electric vehicles, they should also include requirements to install EV infrastructure such as appropriate access to electrical outlets. Rolling Hills Estates has developed such an ordinance that can serve as a template.

MM-TR88 –The siting of locations for PEV and other alternative fueling stations should be coordinated with regional infrastructure plans.

### *Section 3.1 Aesthetics*

SCE may have to develop new generation, transmission and distribution facilities to support RTP/SCS goals and future transportation needs. Therefore, SCE urges SCAG to encourage collaboration between affected stakeholders including Caltrans, transit agencies, railroad companies and the ports when planning decisions for these projects are contemplated. Such collaboration will minimize potential conflicts with identified viewshed, and further land use compatibility goals.



February 21, 2012

Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017  
Attn: Margaret Lin Sent by email to: [lin@scag.ca.gov](mailto:lin@scag.ca.gov)

**SUBJECT:**

**FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM  
(FTIP) PROPOSED AMENDMENT #11-24, 20 FOR DRAFT 2012-  
2035 REGIONAL TRANSPORTATION PLAN/ SUSTAINABLE  
COMMUNITIES STRATEGY (RTP/SCS) PROGRAM  
ENVIRONMENTAL IMPACT REPORT (PEIR)**

Dear Ms. Lin:

Thank you and SCAG for this opportunity to provide written public comments pertaining to the subject Draft PEIR document for the 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/ SCS) document, dated December 2011, and Federal Transportation Improvement Program (FTIP) Proposed Amendment # 's 11-24, -20:

The following highway projects in the City of Redlands area of San Bernardino County, have been mistakenly left out of the identified FTIP projects lists and associated RTP/SCS documents:

1. Redlands Boulevard/ Colton Ave./ Alabama St./ RR-X's (SanBAG) Intersection(s) reconstruction
2. San Bernardino Avenue/ I-210 Freeway Interchange Upgrade (impacting proposed Redlands Crossing (super WalMart) development (see comment letter pertaining to Redlands Crossing Draft Environmental Impact Report, attached.)
3. Alabama Street/ I-10 Freeway Interchange Upgrade

C: San Bernardino County Board of Supervisors  
City of Redlands City Council



**STEPHEN W. ROGERS, P.E. CONSULTING**

820 CHURCH ST. REDLANDS, CA 92374

PHONE: 909.556.1988 (CELL) EMAIL: STEVE\_ROGERS@VERIZON.NET

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January 18, 2012

City of Redlands

Development Services Department, Planning Division

210 East Citrus Avenue

Redlands, CA 92373

Attn: Robert D. Dalquest, AICP (e-mail: [rdalquest@cityofredlands.org](mailto:rdalquest@cityofredlands.org))

**Subject: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR REDLANDS CROSSING CENTER (SC# 2007081111), dated 11/21/11**

Dear Mr. Dalquest:

The following comments are offered herewith, pertaining to the subject document, reserving the right, however, to make additional comments in writing, or during the public hearing process, when the project and associated entitlement applications are presented to the Redlands Planning Commission and City Council:

1. The project description as published with the original Notice of Availability (NOA) refers to applications for associated documents that have not been made available to the public for review at this time, and in conjunction with a review of the project DEIR; to include, but not be limited to: Super WalMart Conditional Use Permit (CUP) and Tentative Parcel Map. CEQA requires all associated entitlement applications needed for project approval be processed concurrently, and not to be processed in a piecemeal fashion.
2. The project with the proposed mitigation measures identified in the DEIR, is not compatible or consistent with the 2008 Regional Transportation Plan (RTP), the Draft 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and Program Environmental Impact Report (PEIR), or the San Bernardino County Congestion Management Plan (CMP) and RTIP. Especially troubling is the response letter to the 2007 Project NOA from the Southern California Association of Governments (SCAG), dated September 11, 2007 indicating, "We have reviewed the Redlands Crossing, and have determined that the proposed project **is not regionally significant** per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206)."

3. The traffic study in the appendix, as prepared by Urban Crossroads for Michael Bradman Associates, is technically deficient and has not been properly prepared pursuant to the San Bernardino County Congestion Management Plan (CMP) Traffic Impact Analysis (TIA) standards and guidelines. See the attached “Exhibit A” listing regarding specific shortcomings and concerns. Especially troubling is the wording contained on page 17, under Analysis Overview: “It should be noted that consistent with the requirements of Measure “I”, formal compliance with the CMP traffic impact analysis guidelines is no longer required with the City’s adoption of a development impact fee (DIF).”

## Exhibit A

The following clarifications are requested pertaining to the Traffic Impact Analysis (TIA) prepared by Urban Crossroads for the Redlands Crossing Center:

- 1) Reason why AM peak analysis was not completed (esp. considering proximity to Citrus Valley High School).
- 2) Tennessee St / Lugonia Avenue - disagree that there is room for WB right turn lane as the lane is only 20' wide for about 2 car lengths
- 3) Alabama Street / San Bernardino Avenue- disagree that there are 2 EB through lanes as the receiving lanes merge less than 125' from the intersection
- 4) Many of these intersections are close together. Was a coordinated analysis done to see if the traffic from one intersection would back up into another intersection?
- 5) Exhibit 3-1 The number of existing lanes on Lugonia Avenue is wrong in several locations. It nears to 1 lane eastbound in several places. Nowhere is it 4 lanes in each direction as noted between Alabama Street and Tennessee Street. If the author meant 4 lanes total, then it has 4 lanes in several locations that are shown on the exhibit as 2.
- 6) Table 3-2 It looks like the number of mainline freeway lanes includes auxiliary lanes and ramp lanes and they should not be included. The auxiliary lanes and ramps should be analyzed separately. Miles between the segments were not included so the density calculation could not be checked.
- 7) The traffic level of service on San Bernardino Ave. between Alabama Street and New York Street does not operate properly today. The project TIA should analyze how the 210 ramp/ San Bernardino Avenue signalized intersection area could be enhanced in order to operate appropriately with project traffic.
- 8) Did the improvements at the SR-210 and the San Bernardino Avenue Interchange area take into consideration the Caltrans 210 PSR dated April 2008? Both construction alternatives include realigning Tennessee Street between San Bernardino Avenue and Lugonia Avenue, and ramp improvements that impact the subject development project site.
- 9) Did the cumulative projects include the major development proposed in Highland east of Wabash Avenue?
- 10) Did the traffic study include any improvements anticipated under the Congestion Management Plan NEXUS program?
- 11) Page 6-1 indicates that the methods used for the 2013 traffic forecasts are discussed in Section 6. Where in Section 6 are they discussed?
- 12) Is East Valley Traffic Model the correct model to model this area? With number of project trips, why wasn't a model prepared for this project TIA. Since the 2030 without project volumes are based on 2030 model volumes less the project trips, this would assume the project was included in the 2030 EVTm. Was the Redlands Crossing (incl. Super WalMart) included in that model?

- 13) Who is reviewing the traffic study on behalf of the City of Redlands?
- 14) Is the choice of 2030 for the future year scenario appropriate? Should the analysis instead be based upon 2010 (current) traffic data and a future year scenario for 2035 (at least 20 years past proposed opening year 2013)?

Plan



# GATEWAY CITIES

COUNCIL OF GOVERNMENTS

February 9, 2012

Mr. Hasan Ikhata, Executive Director  
 Southern California Association of Governments  
 818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
 Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

### **Gateway Cities Comment to SCAG on Draft 2012 RTP/SCS**

Thank you very much for the opportunity to review and comment on the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated draft Program Environmental Impact Report (PEIR). It is clear that a great deal of hard work and successful stakeholder involvement have gone into creating these very impressive documents. SCAG has done an extraordinary job of meeting multiple planning requirements and has produced an innovative and visionary plan.

The Gateway Cities respectfully submits the following comments and questions for your consideration and response:

- **Growth Forecast**

- We understand that SCAG staff is recommending that the growth forecast be adopted at the city level rather than at the county level, which has been the practice in the past. We request that SCAG continue the past practice of adopting the growth forecast at the county level to allow for much-needed flexibility as local jurisdictions implement their general plans.

- **Financial Plan**

- The draft Financial Plan includes over \$110 billion to come from new mileage-based user fees that would be implemented to replace and augment gasoline taxes. This is the largest single element of the overall new revenue sources anticipated for the RTP. We would like additional information on how these fees might affect lower-income residents of the SCAG region, particularly since many such residents are concentrated within the Gateway Cities.

- The Financial Plan envisions a future split among local, state, and federal funding sources that is quite different from the current split, in which over 70% of all transportation funding is of local origin. In the future, the Plan shows 22% from federal and 25% from state, leaving only 53% from local sources. Can SCAG present a chart or plan showing how and when this transition would occur between 2012 and 2035?
  - Table 3.4.1 presents Core and Reasonably Available local sources of revenue and includes development mitigation fees for Orange and Riverside Counties. Does the revenue estimate include any assumption of funds from the potential adoption of a development fee in Los Angeles County?
- Major Highway Projects
  - Exhibit 2.1 and Exhibit 4.12 show major highway projects under the Regional Transportation Plan. Some major Gateway Cities projects – notably those along I-5 between I-605 and the County line – are not indicated on these exhibits. We understand that this is because the exhibits show only Plan projects and do not show projects in the current Federal Transportation Improvement Program (FTIP). We suggest that the exhibits be amended to include FTIP projects over a certain cost threshold so as to show a more complete picture of regional highway infrastructure investments.
- High-Speed Rail
  - We understand that discussions are ongoing among SCAG, the County Transportation Commissions, and the California High Speed Rail Authority regarding levels of available funding for rail infrastructure improvements within the SCAG region. We look forward to further details about the specific investments that will be made in Southern California's rail infrastructure under the 2012 RTP, particularly those that affect the Gateway Cities.
- Express/HOT Lane Network
  - Table 2.6 lists several potential routes for Express/HOT Lane development. Two of these run through the Gateway Cities: I-405 from I-5 to the LA/OC County line; and SR-91 from I-110 to SR-55. What is the anticipated timeframe or years of construction and completion for these projects? Will mixed-flow lanes be added or removed in order to provide the HOT lanes?
- Goods Movement
  - Exhibit 2.8 displays "rising truck volumes in the SCAG region." However, the assumptions underlying the data in this exhibit are not clear, and should be explained in the text. For example, how do these figures relate to the cargo forecast being projected by the San Pedro Bay Ports or the figures assumed in the I-710 Corridor and 91/605/405 Corridor processes? Are the figures in the exhibit based on SCAG's revised truck model? Also, would different truck volumes be found under different RTP alternatives?

- To avoid local impacts to member cities, the Gateway Cities respectfully request that the potential routes for the East-West Freight Corridor be limited to freeway routes only, and that non-freeway routes not be further considered.
- The tables relating to the proposed East-West Freight Corridor present a confusing picture of the plan for implementing reduced-emissions vehicles on the corridor. Table 2.8, Benefits of an East-West Corridor Strategy, mentions “50% clean truck utilization” under Environment, but also lists “Zero-emissions technology” under Community. Table 2.11, Environmental Benefits, shows an “East-West Freight Corridor with 100% Zero-Emission Vehicles.” It would be helpful to clarify the timeline on which SCAG anticipates low- or zero-emission trucks would be phased in specifically on the East-West Freight Corridor. This implementation timeline should be the same on the East-West Corridor as on the I-710 Corridor through the Gateway Cities, and both should employ 100% zero-emission vehicles.
- Sustainable Communities Strategy
  - Page 79 of the SCS Background Documentation report states that “Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected and integrated into the alternatives (with possible revisions for Alternative C only).” Since the PEIR alternatives are designated by number (1, 2, 3) rather than by letter (A, B, C), please clarify whether this statement refers to Alternative 3, called the “Envision 2 Alternative” in the PEIR. Also, we would appreciate having specific information on where, if anywhere, revisions may have been made to the Gateway Cities’ jurisdictional input as reflected in our subregional SCS.

We thank you again for the opportunity to review and comment on these draft documents. We also remain especially grateful to the SCAG staff for all the support they provided to the Gateway Cities as we developed our subregional SCS.

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond Dunton". The signature is fluid and cursive, with a large initial "R" and "D".

Raymond Dunton, President, Board of Directors  
Gateway Cities Council of Governments and  
Council Member, City of Bellflower



Plm  
CITY OF BURBANK  
COMMUNITY DEVELOPMENT DEPARTMENT

150 North Third Street, P.O. Box 6459, Burbank, California 91510-6459  
www.ci.burbank.ca.us

February 13, 2012

Jacob Lieb  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

via electronic mail to [lieb@scag.ca.gov](mailto:lieb@scag.ca.gov)

**Re: Comments on 2012-2035 Regional Transportation Plan / Sustainable Communities Strategy and Draft Program Environmental Impact Report**

Dear Mr. Lieb:

The City of Burbank has reviewed the Draft 2012-2035 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and the related Draft Program Environmental Impact Report (PEIR) and respectfully submits the following comments. The Burbank City Council reviewed and endorsed the content of this letter at its February 7, 2012 meeting.

**Aviation Forecast**

The City of Burbank has submitted comments on prior RTPs regarding the aviation forecast. As we have asserted in prior years, the City of Burbank continues to believe that the forecast of 9.4 million annual passengers (MAP) for the Bob Hope Airport is unreasonably high. Two of the primary constraints to passenger volume at the Airport are the number of passenger gates and the capacity of streets serving the Airport. The City believes that neither the existing streets nor the existing 14 gate terminal building could accommodate 9.4 MAP. The City and Airport Authority are engaging in a joint public outreach process to discuss the future of the airport, which may include a new terminal building. However, it is unlikely that anything other than a replacement terminal with the same number of passenger gates as the current terminal would be acceptable to the residents of Burbank who must ultimately vote on whether to approve any new terminal facility.

Based on the passenger volume trend since the airport opened in 1930, the City Council and City staff believe that 8.0 MAP is a more reasonable number for 2035. The City is using this number in our own forecasts, including our 2035 General Plan update and related EIR. This number is also consistent with the Airport Authority's own passenger forecast.

**Transportation Projects**

**Project Funding**

The 2012 RTP Financial Plan identifies two broad categories of revenue sources to fund projects identified in the plan. Core revenues, in the amount of \$305 billion, are identified as committed or historically-available funding across the six-county region. Reasonably-available revenues, in the

amount of an additional \$226 billion, are identified as new transportation funding likely to materialize during the plan period. These additional funds include revenues from adjustments to state and federal gas taxes, vehicle-miles-traveled user fees, tolling, private funding, and freight fees.

The plan assumes that these reasonably-available revenues will materialize to fund projects in the RTP Financially-Constrained Plan and are necessary to meet the region's greenhouse gas and air quality reduction mandates. However, many of these reasonably-available funding sources may in fact not materialize, especially given the controversial nature of some of the proposals. In particular, it may not be prudent to expect that VMT or mileage-based fees are politically feasible to implement, especially if these types of funding sources are relied upon to implement necessary projects in the Financially Constrained Plan. Further, the City is unaware of any VMT fee proposal being currently discussed at the regional or state level.

The City believes that SCAG should consider an alternative in the PEIR that does not assume the reasonably-available revenues identified in the current draft become available during the plan period. This alternative would then modify the list of projects to include only those that are funded under the core revenues and assess the air quality and greenhouse gas impacts from this reduced plan. The City especially notes the significant uncertainty related to funding of the California High Speed Rail system.

#### Local Transit Service

The Transit and Rail policies in Section 2 - Transportation Investments, include emphasis on encouraging local transit operators to expand local transit services to serve as neighborhood circulators and "last-mile" transit connections between regional transit systems and major residential and employment centers. The City supports policies to encourage expansion of local transit service; however, the plan does not address the significant difficulty local agencies currently have in funding these types of services with the operating funds currently available to local jurisdictions within the region. The Plan should more specifically identify the additional funding necessary to implement expanded local transit, and should bolster policies and objectives that expand the availability of operations funding to local transit agencies.

#### Regional Transit Projects

The City believes that there are a number of regional transit projects in the Arroyo Verdugo Cities subregion of Los Angeles County that should be included in the 2012 RTP, especially if additional funding sources are identified over the next 25 years. These projects are identified in other long-range planning documents and, specifically, are called out in Metro's Long Range Transportation Plan adopted in 2009 as "Strategic Unfunded Projects." These important projects would improve transit mobility in and around the Arroyo Verdugo Cities region, and would especially improve east-west travel between the San Fernando and San Gabriel Valleys. The City believes that the following projects should be considered for implementation using additional reasonably-available funding sources as described in the Financial Plan:

- a. Regional transit connection between the North Hollywood Red Line / Orange Line Station and the Gold Line in Pasadena via Burbank and Glendale
- b. Extension of the Orange Line and/or Red Line to Bob Hope Airport
- c. Bus Rapid Transit (BRT) or other regional transit connection between Downtown Burbank and Hollywood via Universal City.

Mr. Jacob Lieb  
February 13, 2012  
Page 3

- d. Burbank-Glendale Light Rail (implemented as light rail, BRT, heavy-rail DMU, or other technology)

#### High Speed Rail

The plan identifies the California High Speed Rail system as influencing regional and intercity travel in the SCAG region, but does not specifically identify how this planned transportation improvement will integrate with regional and local systems. Integration of any intercity transit system with existing and planned transit services is critical to ensuring the effectiveness of this major transportation investment. The 2012 RTP should include stronger policies that support development of regional and local connections to High Speed Rail, including identification of future regional projects and funding needs that support High Speed Rail connections to the local network.

#### Land Use Policies

Regarding the variety of land use policies discussed in the RTP/SCS, the City provides a general comment that for these policies to be effective, land use control must remain at the local level. The RTP/SCS provides blanket policies that apply generally to the entire SCAG region and may not be appropriate in every situation. For example, the RTP/SCS associates Transit Oriented Development with higher residential densities and multifamily or mixed-use housing products. However, the City of Burbank contains many single family residential neighborhoods that are located within walking distance of transit centers and corridors, and within walking distance of commercial districts. The City is pleased that the RTP/SCS was developed based on existing local General Plans and local input, and that cities will continue to have sole authority over local land use decisions.

The City of Burbank appreciates the opportunity to comment on the RTP/SCS and PEIR and looks forward to continuing to work with SCAG on the issues addressed herein.

Sincerely,  
Community Development Department



Michael D. Forbes  
Assistant Community Development Director / City Planner

cc: Honorable Mayor and Members of the City Council  
Michael Flad, City Manager  
Amy Albano, City Attorney



# CITY OF LOS ANGELES

CALIFORNIA



**ANTONIO R. VILLARAIGOSA**  
MAYOR

**Jaime de la Vega**  
GENERAL MANAGER

**DEPARTMENT OF TRANSPORTATION**

100 S. Main St., 10<sup>th</sup> Floor  
LOS ANGELES, CA 90012  
(213) 972-8470  
FAX (213) 972-8410

February 14, 2012

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

**Re: Draft 2012 Regional Transportation Plan / Sustainable Communities Strategy**

Dear Mr. Ikhata:

The City of Los Angeles appreciates the opportunity to review and comment on the Southern California Association of Governments' (SCAG) Draft 2012 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). SCAG is to be commended for an unprecedented multi-year effort to develop the 2012 RTP/SCS, which included extensive outreach. In particular, the City appreciates the exceptional effort on the part of SCAG staff to prepare the first Sustainable Communities Strategy, as required by SB 375.

After careful review of the draft RTP/SCS, the departments of Transportation, Airports and City Planning have provided comments that clarify the City's position regarding, and request modifications to, certain areas of the RTP/SCS. Accordingly, the Los Angeles Department of Transportation (LADOT) prepared the attached report to the City Council that includes comments on the draft 2012 RTP/SCS by all three City departments. The Los Angeles City Council, on February 10, 2012, adopted the attached report as the City's comments on the Draft 2012 RTP/SCS.

Included in the City's comments is a list of projects that the City requests be added to the Strategic Plan of the RTP/SCS. Moreover, as indicated in the attached report, the City requests that the City's adopted Bicycle Plan and Mobility Hubs initiative be included in the Strategic Plan, if not already included in the Constrained Plan.

We look forward to working with SCAG staff to substantially incorporate into the RTP/SCS those elements of the City's comments that are directed to the content of the

2012 RTP/SCS. After review of the attached comments, please contact Tom Carranza or Miles Mitchell of my staff for further discussions regarding LADOT's comments, and Ken Bernstein or Naomi Guth regarding comments from the Department of City Planning. We look forward to a continued mutually beneficial collaboration between the City and SCAG as we address future regional challenges and opportunities.

Sincerely,

A handwritten signature in black ink, appearing to read "Jaime de la Vega". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jaime de la Vega  
General Manager

JTV:mm

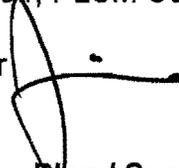
Attachment

c: Borja Leon, Deputy Mayor Transportation  
Matthew Karatz, Deputy Mayor Economic & Business Policy  
Gerry Miller, Chief Legislative Analyst  
Michael LoGrande, City Planning Department  
Michael Feldman, Los Angeles World Airports

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

Date: February 6, 2012 (Revised Report)

To: The Honorable City Council, City of Los Angeles  
c/o City Clerk, Room 395  
Attention: Honorable Bill Rosendahl, Chair, Transportation Committee  
Attention: Honorable Ed Reyes, Chair, PLUM Committee

From: Jaime de la Vega, General Manager  
Department of Transportation 

Subject: **Draft 2012 Regional Transportation Plan / Sustainable Communities Strategy (CF 11-1223)**

### Summary

This report recommends that the Council authorize the Los Angeles Department of Transportation (LADOT) to submit additional comments on behalf of the City of Los Angeles to the Southern California Association of Governments (SCAG) on the draft 2012 Regional Transportation Plan /Sustainable Communities Strategy (RTP/SCS).

### Recommendations

- 1) **APROVE** the comments provided in this report as the City of Los Angeles' comments related to transportation in the SCAG draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).
- 2) **DIRECT** LADOT to transmit comments to SCAG that are substantially consistent with those contained in this report, including the attached comments from other departments.
- 3) **DIRECT** LADOT to work with SCAG to incorporate the comments into the final RTP/SCS and related Program Environmental Impact Report (PEIR).

### Background

Every four years the Southern California Association of Governments (SCAG) prepares a Regional Transportation Plan (RTP) for the six-county region. The 2012 RTP/SCS includes planned transportation projects and demographic assumptions through the year 2035. The plan presents a strategy for the investment of \$524.7 billion in the region's transportation system between 2012 and 2035 and, for the first time, a Sustainable Communities Strategy (SCS) for the six-county region.

The SCS, required by SB 375, focuses on reducing greenhouse gas emissions (GHGe)

from cars and light trucks by means of several strategies, including integration of land use and transportation planning, transit system expansion, and transportation demand management (TDM). The California Air Resources Board (CARB) established regional GHGe reduction goals of eight percent per capita by 2020 and thirteen percent per capita by 2035, compared with 2005 levels. SCAG's analysis indicates that the draft RTP/SCS would achieve the 2020 target, and would exceed the 2035 target with a GHGe reduction of sixteen percent.

According to SCAG's analysis and modeling, the draft RTP/SCS also meets the federal conformity requirements for air quality. It is important to note that reducing GHGe is not required for achieving air quality conformity. Therefore, although many of the strategies that achieve air quality conformity also assist with GHGe reductions, the two analyses are generally independent of each other.

A Regional Transportation Plan (RTP) also requires that there be reasonably available funding sources. The RTP proposes expenditures of \$524.7 billion, and SCAG states that without new revenue sources the RTP faces a funding shortfall of approximately \$219.5 billion. Various means to make up the shortfall are set forth. The RTP suggests that \$127.5 billion of the shortfall could be addressed by action at the State or Federal level to increase the gas tax \$0.15 per gallon between 2017 and 2024. The RTP states the State and Federal government could then replace the gas tax with an indexed mileage-user fee of \$0.05 per mile beginning in 2025. If the mileage-based fee was not implemented, then there would be a need to further increase the gas tax to generate the revenues that would have been created by the mileage-based user fee. Although these proposals depend primarily on State and/or Federal action, they deserve further discussion within the City as the implementation year of 2017 approaches.

SCAG is to be commended for a multi-year effort to develop the 2012 RTP/SCS, including an unprecedented outreach effort. In particular, the passage of SB 375 required an extensive public education campaign including outreach to cities, environmental, public health and business groups. SCAG conducted a series of periodic workshops across the region, which included preparation of in-depth graphic and narrative presentation materials. The City appreciates the outstanding outreach effort, both to the City itself and across the region.

Pursuant to the Council action of October 5, 2011, and in accordance with past practice, LADOT has reviewed the draft 2012 RTP/SCS and compiled proposed comments to SCAG. In addition, LADOT has coordinated the preparation of these comments on the RTP/SCS with other City departments that are most impacted by the RTP. LADOT very much appreciates the cooperation of the departments of Los Angeles World Airports (LAWA) and City Planning each of which have provided comments. The Port of LA has indicated that it does not have formal comments at this time. The Metro staff report on the RTP/SCS is attached as Attachment B.

Report to City Council, dated September 21, 2011

On October 5, 2011, the City Council adopted a joint report (Attachment A) by the Departments of City Planning and Transportation entitled "Alternatives Proposed by SCAG for the 2012 Regional Transportation Plan / Sustainable Communities Strategy" (CF 11-1223). This report, dated September 21, 2011, provided comments on four draft scenarios for the RTP/SCS, released by SCAG in July 2011. Specifically, Attachment A of the report identified proposed RTP/SCS strategies that City staff believed would, if adopted, have a potential impact on the City. For purposes of the report, "impact" was defined as a significant change from adopted City policy. Staff believes that the report, dated September 21, 2011, continues to reflect City policy with regard to many of the strategies presently included in the draft RTP/SCS.

One of the objectives of the report was for the City's comments to be incorporated into the RTP/SCS. We are pleased to report that to a large extent the City's comments appear to have been acknowledged by SCAG and therefore the RTP/SCS does not include several of the specific proposals of concern. Specifically, three of the concerns raised, and the status of the strategy in the draft RTP/SCS, are as follows:

- 1) Phased implementation of 5% of major arterials to have dedicated bus lanes. As requested by the City, the RTP does not include a specific percentage for implementation. As explained in the September 21<sup>st</sup> report, the City supports careful and selected implementation of bus lanes, but does not want to commit to implementing a specific percentage of bus lanes on City arterials.
- 2) 10% of primary and secondary arterials to include bike facilities. As requested by the City, the RTP does not include a specific percentage for implementation. As explained in the September 21<sup>st</sup> report, the City supports careful and selected implementation of bike lanes, but does not want to commit to implementing a specific percentage of bike lanes on City arterials. Rather, the City supports the specific implementation of its adopted Bicycle Plan.
- 3) Cordon pricing around key activity centers – initial pilot projects in downtown Los Angeles and potentially LAX complex. As requested by the City, this project has been included in the Strategic Plan portion of the RTP/SCS, which acknowledges that the project still requires further study and has not been officially approved by the City.

**Discussion of Policy Concerns and Comments**

Although most of the concerns raised in the September 21, 2011 report appear to have been addressed, LADOT has identified additional areas of concern with regard to the draft 2012 RTP/SCS, which was released for public comment on December 20, 2011.

LADOT has comments and concerns in the following areas:

Project List for RTP/SCS

The RTP includes an extensive project list. As stated in the Project List appendix, the list is divided into three sections, as follows: 1) The Federal Transportation Improvement Program (FTIP), which forms the foundation of the RTP project investment strategy and represents the first six years of already committed funding; 2) the Financially Constrained list of projects not included in the FTIP but which have "reasonably available" funding; and 3) the Strategic Plan representing an unconstrained list of potential projects that the region would pursue given additional funding and commitment.

As with past RTP cycles, LADOT has reviewed all three project lists. The FTIP and Constrained project lists appear to include, with one exception, all City of Los Angeles projects with either committed or reasonably available funding. These lists are developed through ongoing coordination between City, Metro and SCAG staff. The one project that should be added to the FTIP list is a Transit Bureau project as follows:

TIP ID LAF5427 – DASH Clean Fuel - Five Higher Capacity Vehicles (Purchase five 35-foot CNG clean-fuel buses to replace five 30-foot propane vehicles). SCAG is aware that this project needs to be added to the FTIP project list, and it is pending to be added to the list.

Regarding the Strategic Plan list, in an effort to expedite many as yet unfunded City projects, LADOT has prepared the attached list (Attachment E) of approximately ninety projects that the City is requesting to be added to the Strategic Plan.

Additionally, LADOT wishes to draw attention to both the Los Angeles Bicycle Plan and Mobility Hubs initiatives (a First Mile/Last Mile strategy). These efforts support both the Active Transportation and Transportation Demand Management strategies of the RTP. The RTP includes numerous references to expanded bicycle facilities and other First Mile/Last Mile strategies, and therefore these strategies are presumably included with likely funding in the Financially Constrained plan. However, to the extent these initiatives are not included in the Constrained plan they should be added to the Strategic Plan.

Importantly, Metro staff has also reviewed the RTP and found that it includes all the projects and programs in the Metro 2009 Long Range Transportation Plan (LRTP). A copy of the Metro staff report, dated January 18, 2012, is attached for reference. The RTP does not model the 30/10 (Fast Forward) proposal for Measure R projects, because the proposal has not yet been approved by the Metro Board, and still requires federal approvals. However, SCAG is supportive of the 30/10 proposal and will likely amend the RTP if the proposal secures additional approvals.

The Metro report also highlights key projects, within Los Angeles County, included in the RTP which are not included in Metro's 2009 LRTP. These key projects include:

- East-West Freight Corridor will be studied along a five mile band generally following the SR-60 corridor between the I-710 and the I-15.
- Phase I of the California High Speed Rail Authority (CHSRA) is in the draft 2012 RTP in the Constrained Plan, pending an agreement between the CHSRA and Metrolink to identify funds to bring local systems up to higher speeds (110+ mph) where possible.
- A regional Express/HOT Lane Network that expands Metro's Fast Lanes pilot project to include the I-405 and SR-91. This goes beyond the federally funded pilot studies on the I-10 and I-110 freeways.

As an overall comment, the City wishes to emphasize that, for future RTP/SCS project lists, the City, Metro and SCAG need to continue the effort to improve connectivity between various transit systems. For example, in South Los Angeles County, there needs to be greater emphasis placed on the development of feeder systems to connect and support the Blue, Green, Expo and Crenshaw lines. These systems would include, but not be limited to, expanded Bus Rapid Transit and improved bicycle and pedestrian linkages.

Recommendation:

As described above, the City should request that SCAG include the attached list of projects to the Strategic Plan. Additionally, to the extent the Los Angeles Bicycle Plan and Mobility Hubs are not included in the Constrained Plan, they should be added to the Strategic Plan.

#### CEQA Streamlining

The adopted September 21, 2011 City report, prepared by the Planning and Transportation departments, included the following comments:

"The Sustainable Communities Strategy will include land use maps which will facilitate CEQA streamlining of development projects. According to SCAG staff, the CEQA relief provided by SB 375 is substantial. Therefore, the City should carefully review the draft SCS land use maps to ensure the maps are consistent with adopted City land use plans.

SB 375 allows for CEQA streamlining provided a proposed project qualifies as follows:

- 1) The project must be consistent with the land use designation contained in

the land use maps included in the Sustainable Communities Strategy. The maps will describe land use densities and types according to SCAG's Land Development Categories (LDC's).

- 2) The project qualifies as a Transit Priority Project (TPP), as defined by SB 375. To qualify as a TPP, a project must meet certain minimum density requirements and must be located within ½ mile of either a "major transit stop or high-quality transit corridor" (SB 375 - Section 21155). According to SCAG staff, most of the City qualifies as a TPP area because of existing transit stations and corridors.

CEQA streamlining, according to information provided by SCAG, will allow many projects meeting the above two criteria to receive the equivalent of a "mitigated negative declaration" in the development review process. This could impact development review by several departments, including Planning and Transportation.

The City requests that SCAG provide copies of the draft SCS land use maps for review by the Planning and Transportation departments, and the Council and Mayor, prior to SCS adoption."

Because the SCS will emphasize increased development within ½ mile of either a "major transit stop or high-quality transit corridor" there may be an increased need for transportation infrastructure in these areas. LADOT is concerned that CEQA streamlining could allow development to occur with impacts on transportation infrastructure.

Recommendation:

LADOT staff has consulted with staff of DCP and the City Attorney regarding the impact of CEQA streamlining on the City's development review process. Input received from these sources indicates that although CEQA streamlining of various types will occur following adoption of the RTP/SCS, the City may retain some degree of "discretionary approval" authority over development projects that are subject to CEQA streamlining. LADOT believes that this area deserves further study. This is a complex and important subject, and the City should carefully evaluate and prepare for the impact of CEQA streamlining following adoption of the RTP/SCS.

### **Comments from Other City Departments**

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

- LAWA emphasizes that its first priority is to "maintain safe and efficient airports." Like most airports, LAWA receives grant funds from the FAA for eligible

construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property.

- The RTP includes a proposal to promote a regional system of airport express buses, modeled in part on the FlyAway service currently operating at LAX. Although express buses are a "promising solution" to certain ground access problems, LAWA advises that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service. LAWA cautions that its experience and studies have shown that the expansion of the express bus system at LAX will be challenging. Moreover, the expansion of express bus service, by itself, may not be effective in increasing passenger demand at "secondary" airports.
- LAWA agrees that "the aviation constraints in the region, and potential dispersion of that activity at other airports, should be re-examined in subsequent regional plans."
- LAWA requests that, if possible, SCAG utilize the 2011 Air Passenger Survey, most likely to be released in February, to update various data points in the Aviation and Airport Ground Access appendix.
- LAWA's comments are provided in Attachment C.

#### Department of City Planning (DCP):

The Department of City Planning has provided important comments which are highly technical and lengthy, hence they are attached to this report as Attachment D.

#### **Conclusion**

The draft 2012 RTP/SCS and PEIR, released by SCAG on December 20, 2011, represent an outstanding effort to meet both State and Federal planning requirements, as well as provide for the multifaceted needs of the region. As described in this report, including comments from other departments, City staff has provided comments in the areas of transportation and land use. City staff has provided recommended comments to SCAG for City Council and Mayor review regarding these proposals.

#### **Fiscal Impact**

This report contains comments regarding proposed policies and projects included in the draft 2012 RTP/SCS and related PEIR. The comments to be transmitted to SCAG will not impact the City's General Fund.

Attachments

- A) Council Approval, dated October 5, 2011, of report entitled "Alternatives Proposed by SCAG for the 2012 Regional Transportation Plan / Sustainable Communities Strategy (CF 11-1223)," dated September 21, 2011.
  - B) Metro staff report, dated January 18, 2012, regarding the draft RTP/SCS
  - C) Los Angeles World Airports comments, dated January 20, 2012, regarding the draft RTP/SCS
  - D) Department of City Planning comments, dated January 30, 2012.
  - E) City of Los Angeles Projects Requested for Addition to the Strategic Plan
- c: Mayor Antonio Villaraigosa  
Attn: Borja Leon and Matthew Karatz  
Gerry Miller, Chief Legislative Analyst  
City Planning Department  
Los Angeles World Airports  
Port of Los Angeles

CITY OF LOS ANGELES  
CALIFORNIA

JUNE LAGMAY  
City Clerk

HOLLY L. WOLCOTT  
Executive Officer



ANTONIO R. VILLARAIGOSA  
MAYOR

Office of the  
CITY CLERK

Council and Public Services  
Room 396, City Hall  
Los Angeles, CA 90012  
General Information - (213) 878-1133  
Fax: (213) 978-1040

When making inquiries relative to  
this matter, please refer to the  
Council File No.

[www.cityclerk.lacity.org](http://www.cityclerk.lacity.org)

October 7, 2011.

To All Interested Parties:

The City Council adopted the action(s), as attached, under Council File No. 11-1223, at its meeting held October 5, 2011.

A handwritten signature in cursive script, appearing to read 'June Lagmay', is written in black ink.

City Clerk  
srb

#23

File No. 11-1223

TO THE COUNCIL OF THE  
CITY OF LOS ANGELESYour **PLANNING AND LAND USE MANAGEMENT COMMITTEE**  
**and**  
**TRANSPORTATION COMMITTEE**

report as follows:

PLANNING AND LAND USE MANAGEMENT and TRANSPORTATION COMMITTEES' REPORT relative to Southern California Association of Governments (SCAG) proposed alternatives for the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Recommendations for Council action:

1. AUTHORIZE the Los Angeles Department of Transportation (LADOT) and City Planning Department (Planning) to:
  - a. Submit to SCAG the comments contained in Attachment A of the joint LADOT and Planning report dated September 21, 2011 (contained in the Council file), inasmuch as the strategies identified therein may have a potential impact on the City.
  - b. Convey the comments to SCAG requesting that they be incorporated into the 2012 RTP/SCS with the understanding that the comments may be modified and supplemented by the City, with Council and Mayor approval, as the RTP/SCS is further developed.
2. REQUEST SCAG to provide copies of the draft SCS land use maps for review by the LADOT and Planning, Council, and Mayor prior to SCS adoption, inasmuch as the maps will identify geographical areas of the City where projects can be eligible for California Environmental Quality Act streamlining and thereby potentially allow development projects to receive mitigated negative declarations in the development review process and thereby impact growth in the City.

Fiscal Impact Statement: The LADOT and Planning Departments report the potential fiscal impact to the City has not been determined. Further review and evaluation is necessary as more information on the ultimate preferred alternative is presented by SCAG.

Community Impact Statement: None submitted.

#### SUMMARY

At a joint meeting held on September 27, 2011, the Planning and Land Use Management and Transportation Committees considered a joint LADOT and Planning Departments report relative to Southern California Association of Governments proposed alternatives for the 2012 Regional Transportation Plan/Sustainable Communities Strategy. Representatives from the LADOT and Planning gave the Committees background information on the matter. The Committees requested SCAG to provide copies of the draft SCS land use maps for review by the LADOT and Planning Departments, Council and Mayor prior to SCS adoption.

After an opportunity for public comment was held, the Committees recommended Council approve the recommendations contained in the joint report as amended. This matter is now forwarded to the Council for its consideration.

Respectfully submitted,

PLANNING AND LAND USE  
MANAGEMENT COMMITTEE



TRANSPORTATION COMMITTEE



**ADOPTED**

OCT 5 2011

**LOS ANGELES CITY COUNCIL**

<u>MEMBER</u>	<u>VOTE</u>
REYES:	YES
HUIZAR:	YES
KREKORIAN:	YES

<u>MEMBER</u>	<u>VOTE</u>
ROSENDAHL:	YES
PARKS:	YES
KORETZ:	YES
PERRY:	ABSENT
HUIZAR:	YES

SG  
9/27/11  
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**Not Official Until Council Acts**

**Metro**Los Angeles County  
Metropolitan Transportation AuthorityOne Gateway Plaza  
Los Angeles, CA 90012-2952213.922.2000 Tel  
metro.net

REVISED  
**PLANNING AND PROGRAMMING COMMITTEE**  
**JANUARY 18, 2012**

**SUBJECT: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS' DRAFT  
2012 REGIONAL TRANSPORTATION PLAN / SUSTAINABLE  
COMMUNITIES STRATEGY**

**ACTION: APPROVE COMMENT LETTER**

**RECOMMENDATION**

Approve our comment letter on the Southern California Association of Governments' (SCAG) Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

**ISSUE**

In December 2011, SCAG released the Draft 2012 RTP/SCS for public comment. The RTP/SCS identifies regional transportation priorities for the six-county region through 2035. All 2009 Long Range Transportation Plan (LRTP) projects and priorities must be included in SCAG's RTP/SCS to be eligible for federal funds. We have reviewed the Draft 2012 RTP/SCS and Board authorization is being requested to transmit our comments to SCAG in time for their February 14, 2012 deadline.

**DISCUSSION**

As part of SCAG's role as a regional planning agency, they are responsible for addressing regional issues in the six-county area of Southern California. The 2012 RTP/SCS is the vehicle to provide solutions to regional mobility and land-use issues. For better integration of land-use and transportation, it must also demonstrate reduction of Greenhouse Gas Emissions (GHGe) from passenger vehicles. Per the requirements of SB 375, the Draft 2012 RTP/SCS includes Southern California's first SCS. The SCS is required to analyze how the collective impact of transportation policies, transportation investments and land-use policies affect the GHGe based on population projections in 2020 and 2035. Transportation issues are primarily addressed in the RTP portion of the Draft, and the SCS portion of the Draft presents strategies to meet GHGe targets.

SB 375 compelled SCAG to conduct a more extensive outreach process than has been historically required for RTP development. This process yielded unprecedented levels of public participation and engagement, particularly among environmental and public health advocates championing increased funding for active transportation to reduce GHGe and provide great opportunities for physical activity. The Los Angeles County Department of Public Health was a leading voice in this advocacy.

### Regional Transportation Plan

In general, the Draft 2012 RTP/SCS is a well-written document that properly identifies many of the key transportation issues that the region is facing. It includes all of the projects and programs in our 2009 LRTP. SCAG has proposed new and innovative sources of funding beyond our LRTP program. These funds are for additional projects, regional-maintenance of highway and transit facilities, and meeting Federal Clean Air Act conformity requirements.

There are new transportation projects proposed in the Draft 2012 RTP/SCS, within Los Angeles County, which are beyond revenues that the 2009 LRTP assumes to be available from traditional sources. Some of these projects are listed in the Key Projects subsection below. SCAG is assuming that these new projects are funded with a combination of innovative funding (e.g., container fees and public private partnerships) and increased revenues (e.g. gas tax changes and user-fee per mile).

The Draft 2012 RTP/SCS proposes targeted improvements in the transit network and increases in funding for Transportation Demand Management (TDM), Transportation System Management (TSM), and Active Transportation beyond the levels included in the six county transportation commissions' plans, including our 2009 LRTP.

Funding for these improvements is anticipated from a \$0.15 per gallon increase in the gas tax starting in 2017 and ending entirely in 2024. After the gas tax phase-out in 2024, a proposed user-tax of \$0.05 per mile driven, will be phased-in starting in 2025. The goal of the incremental phase-in is so that consumers will not have any large increases of taxes, yet also allow for an indexing to cover the increasing maintenance costs, due to the gas taxes not being indexed to inflation and not increasing with costs.

### Key Projects beyond the LRTP

The following lists Los Angeles County projects identified in the Draft RTP that are not identified in the 2009 LRTP

- East-West Freight Corridor will be studied along a five mile band generally following the SR-60 corridor between the I-710 and the I-15.
- Phase I of the California High Speed Rail Authority (CHSRA) is in the Draft 2012 RTP/SCS in the Constrained Plan, pending an agreement between CHSRA,

Metrolink and LOSSAN to identify funds to bring local systems up to high speed (110+ MPH) where possible.

- A regional Express/HOT Lane Network that expands our Fast Lanes pilot project to include the I-405 and SR-91. This is beyond the federally funded pilot studies on I-10 and the I-110. The Board is on record supporting these two pilot projects, as well as studying the feasibility of a HOT lane on the I-405 from the Orange County Line to LAX.

### Key Issues

There are several emerging issues that the Draft 2012 RTP/SCS addresses:

- A cordon pricing pilot project feasibility study to be developed with the City of Los Angeles that is included under TDM Measures, and Major Strategic Projects.
- Decreased funding available from federal and state sources and the need to identify new revenue sources is a key RTP concern. SCAG proposes to index the gas tax and to incrementally phase-in user-fees to replace the gas tax starting in 2025.
- The exponential cost of deferred maintenance on highway and transit systems, the need to maintain the regional system in a state of good repair, and the need for additional operations and maintenance funding, is also a key RTP concern.
- The region is anticipated to experience increasing energy costs – residential energy and water use is forecasted as \$19,000 a year in 2035, and the strategies in the SCS reduce it to \$16,000.

### Sustainable Communities Strategy

The Draft 2012 RTP/SCS demonstrates that the region will achieve the GHGe reduction targets established for the region by the State of California Air Resources Board (ARB), as a requirement of California's Sustainable Communities and Climate Change Protection Act, or Senate Bill (SB) 375.

In addition to the transportation elements of the Draft 2012 RTP/SCS, the plan includes a land-use element that was developed in coordination with local jurisdictions. The land-use element responds to the region's changing demographics and housing market demand. It recommends a growth scenario that will more than double the share of households living in corridors that have frequent transit service by 2035. This land-use element is projected to increase the competitiveness of transit service and reduce vehicle miles travelled.

The land-use element in combination with transportation policies, such as the user tax per mile fee, and transportation investments (such as TDM, TSM and active

transportation), support the region in achieving the mandated ARB targets. The Draft 2012 RTP/SCS provides a projected 8% reduction in GHGe by 2020 and a 16% reduction in GHGe by 2035.

The SCS portion includes policies to increase the number of near-zero and zero emission vehicles operating within the region to reduce GHGe, improve air quality and lessen the region's dependency on fossil fuels.

The Draft 2012 RTP/SCS includes \$6 billion for active transportation, a significant increase from \$1.8 billion in the 2008 RTP. It acknowledges that additional analysis regarding active transportation needs to be conducted in order to develop a better understanding of the users and their needs (bicyclists and pedestrians). In cooperation with SCAG, we have initiated a joint study to develop a strategy to address first-last mile connections to transit in Los Angeles County.

The technical appendices to the Draft 2012 RTP were not available for staff review at the time of the writing of this Board report. Additional technical comments on these appendices may be added to the draft letter.

#### **DETERMINATION OF SAFETY IMPACT**

The comment letter on the Draft 2012 RTP/SCS will not have any adverse safety impacts for our employees and patrons.

#### **FINANCIAL IMPACT**

There is no impact on the FY 2012 budget, as we are only submitting a comment letter to SCAG on their Draft 2012 RTP/SCS.

#### **ALTERNATIVES CONSIDERED**

The Board can modify or choose not to release a formal comment letter. The alternative of not sending a letter is not recommended, as we would lose the opportunity to provide SCAG with comments to enhance the 2012 RTP/SCS document.

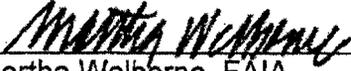
#### **NEXT STEPS**

Upon Board approval, the comment letter will be transmitted to SCAG for their consideration in developing their Final 2012 RTP/SCS. SCAG is scheduled to adopt their Final 2012 RTP/SCS at their April 2012 General Assembly meeting.

#### **ATTACHMENTS**

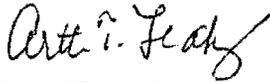
- A. Draft comment letter to SCAG

Prepared by: Brad McAllester, Executive Officer, Long Range Planning  
Heather Hills, Director, Long Range Planning  
Lori Abrishami, Planning Manager, Long Range Planning



---

Martha Welborne, FAIA  
Executive Director of Countywide Planning



---

Arthur T. Leahy  
Chief Executive Officer



Los Angeles  
World Airports

January 20, 2012

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

LAX

LA/Ontario

Van Nuys

City of Los Angeles

Antonio R. Villaraigosa  
Mayor

Board of Airport  
Commissioners

Michael A. Lawson  
President

Valeria C. Volasco  
Vice-President

Joseph A. Aredas  
Robert D. Beyer  
Boyd Hight  
Ann M. Holister  
Fernanda M. Torres-Gil

Gina Maria Lindsey  
Executive Director

Re: Comments on the Draft 2012 Regional Transportation Plan

Dear Mr. Ikhmeta:

Los Angeles World Airports (LAWA) appreciates the opportunity to comment on the Draft 2012 Regional Transportation Plan (RTP), and is committed to working with all levels of government to address the future transportation needs of Southern California. As the operator of two of the region's commercial airports, Los Angeles International (LAX) and Ontario International (ONT), and operator of Van Nuys General Aviation Airport (VNY), LAWA plays an important role in meeting the region's demands for air travel and goods movement.

LAWA, as a proprietary department of the City of Los Angeles, is responsible for operating its airports in a safe, efficient, and fiscally responsible manner on behalf of our passengers and the citizens of each market service area. Furthermore, we must operate within the constraints placed upon our resources by federal law and regulation, along with our contractual obligations to our tenants and partner agencies. It is in this context that LAWA provides the following comments to the Aviation and Airport Ground Access portion of the RTP:

#### 1. Use of Airport Funds

LAWA's first priority is to maintain safe and efficient airports. Our revenues and expenditures are used to support that effort and fulfill our commitment to supporting the national airspace system. All airports have a tremendous demand for capital improvements.

As such, most airports depend on financial support from the FAA via grant funds for eligible construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property. Using airport funds for non-airport functions violates federal law and jeopardizes the airport's ability to receive federal grants.

PO DOC 294681

Nevertheless, LAWA seeks to partner with SCAG to find solutions to support ground access improvements to airports, other primary transportation facilities, and "secondary" airports in the region.

## 2. Use of Airport Express Buses

The RTP includes an "Action Step" which would plan and promote a regional system of airport express buses, modeled in part on the FlyAway<sup>®</sup> service currently operating at LAX. LAWA agrees that express buses are a promising solution to certain ground access problems. However, it has been LAWA's experience that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service.

LAWA has spent a great deal of resources carefully studying the feasibility of establishing new FlyAway<sup>®</sup> routes to serve LAX. However, even for LAX, with its extensive market area and passenger base, it has been a challenge to find station locations that are both viable and successful. LAWA invites SCAG to continue examining ways to bring similar projects to other airports, but cautions that these services, by themselves, may not be effective in increasing passenger demand at "secondary" airports.

## 3. Aviation Activity Constraints

LAWA agrees that the aviation activity constraints in the region, and potential dispersion of that activity at other airports, should be re-examined in subsequent regional plans.

## 4. Additional Technical Clarifications

LAWA also wants to offer the following technical clarifications and comments to the RTP:

- SCAG has reported a number of vehicle trips to LAX under existing conditions as well as under a future forecast for 2035, citing the LAX Master Plan EIR/EIS as a justification for those trip numbers. However, the numbers reported do not correspond to data that LAWA has previously reported or used in any environmental analysis. LAWA requests clarification of those data points.
- LAWA recommends the following changes to Tables 4-6 and 4-7 in the Aviation and Airport Ground Access sections of the RTP:
  - In Table 4-6, the following projects should be included in the list of projects completed since the project notice of preparation in 2008 (footnote 1): Douglas St., La Cienega Blvd., Lincoln Blvd. (all), Nash St.,

Sepulveda Blvd. (both), the I-105 westbound off-ramp at Sepulveda Blvd., and the I-405 at SR-90.

- o Two other projects on Table 4-6, Arbor Vitae St., and the I-405 from I-10 to SR-101, are under construction as of January 2012.
- o In Table 4-7, Project LAX-19, which includes Lincoln Blvd. improvements, has already been completed.
- LAWA recommends that SCAG include in the RTP a portion of the project referred to as LAX-10, widening Aviation Blvd. from Century Blvd. to Manhattan Beach Blvd. to 3 lanes in each direction.

#### 5. 2011 Air Passenger Survey

Lastly, the 2006 LAX Air Passenger Survey was used to create several data points within this section of the RTP. LAWA is hoping to unveil the results of its 2011 Air Passenger Survey in February of this year. SCAG should consider updating its Appendix with this new data as it finalizes the RTP. LAWA will post the results of this survey on our website (<http://www.lawa.org>) once the report is completed.

Thank you for the opportunity to review the 2012 Draft RTP. We hope that these comments will be helpful in developing a successful plan for the region. If you have any questions regarding these comments, please contact Diego Alvarez, Regional Transportation Coordinator, at 424-646-5179 or [dalvarez@lawa.org](mailto:dalvarez@lawa.org).

Sincerely,



Michael D. Feldman  
Deputy Executive Director

MDF:DA:yl

DEPARTMENT OF  
CITY PLANNING  
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LOS ANGELES, CA 90012-4801  
AND  
6262 VAN NUYS BLVD., SUITE 351  
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PRESIDENT  
REGINA M. FREER  
VICE-PRESIDENT  
SEAN O. BURTON  
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GEORGE HOVAGUIMIAN  
JUSTIN KIM  
ROBERT LESSIN  
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CITY OF LOS ANGELES  
CALIFORNIA



ANTONIO R. VILLARAIGOSA  
MAYOR

Attachment D

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INFORMATION  
[www.planning.lacity.org](http://www.planning.lacity.org)

January 30, 2012

The Honorable City Council  
City of Los Angeles  
Room 395, City Hall

Dear Honorable Members:

DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE  
COMMUNITIES STRATEGY

The Department of City Planning (DCP) has reviewed and prepared comments for your consideration regarding the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).

The 2012-2035 RTP/SCS includes land use strategies for addressing the region's mobility needs and desires for healthy, sustainable communities. DCP has worked with SCAG to ensure that the City's land use plans and programs are incorporated and the City's interests addressed in this long-range regional plan. This work has included collaboration with SCAG over the past two years to prepare the population, household and employment growth forecast for the City, ensure that this anticipated growth is consistent with the capacity reflected in City's land use plans, and ensure that this long-term growth is located according to the City's land use plans.

DCP staff has identified five issues related to land use, and recommends changes to the 2012-2035 RTP/SCS to better support the City's interests and role in the regional plan, presented in the draft letter to SCAG attached to this report. These include:

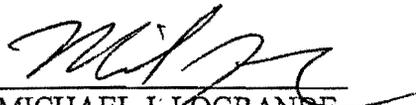
- A. Clarify the definition of "High Quality Transit Areas" where growth is focused;
- B. Clarify the definition of "Urban Centers" where growth is focused;
- C. Correct inaccurate representations of land uses and potential growth around station areas;
- D. Incorporate the 1,684 miles of bicycle facilities identified in the City's 2010 Bicycle Plan; and,
- E. Clarify the role of recently enacted streamlining provisions under the California Environmental Quality Act.

**RECOMMENDATIONS**

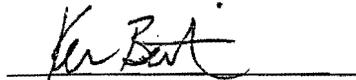
- 1) **Approve** DCP staff recommendations regarding the Draft 2012-2035 RTP/SCS.
- 2) **Direct** DCP staff to forward recommendations to SCAG.

**FISCAL IMPACT**

The proposed recommendations will have no fiscal impact on the General Fund.

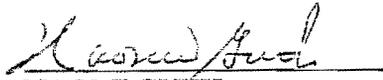
  
MICHAEL J. LOGRANDE  
Director of Planning

  
ALAN BELL, AICP  
Deputy Director

  
KEN BERNSTEIN, AICP  
Principal City Planner

for   
FAISAL ROBLE  
Senior City Planner

  
CLAIRE BOWIN, AICP  
City Planner

  
NAOMI GUTH  
City Planning Associate

Attachment

## ATTACHMENT

[Date]

Ms. Margaret Lin  
Southern California Association of Governments  
818 W. Seventh St., 12<sup>th</sup> Floor  
Los Angeles, CA 90017

Dear Ms. Lin:

### **DRAFT 2012-2035 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY**

The purpose of this letter is to provide comments from the City of Los Angeles Department of City Planning (DCP) regarding the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). DCP appreciates the collaborative relationship with SCAG in developing this plan, which has included working together on the integrated growth forecast and understanding the City's land use plans and programs.

The following addresses five land use issues and recommends changes to the 2012-2035 RTP/SCS in order to better address the City's land use plans and projected growth. This includes:

- A. Clarify the definition of "High Quality Transit Areas" where growth is focused;
- B. Clarify the definition of "Urban Centers" where growth is focused;
- C. Correct inaccurate representations of land uses and potential growth around station areas;
- D. Incorporate the 1,684 miles of bicycle facilities identified in the City's 2010 Bicycle Plan; and,
- E. Clarify the role of recently enacted streamlining provisions under the California Environmental Quality Act.

#### **A. High Quality Transit Areas and Growth Patterns**

The SCS frames growth patterns, in part, in terms of being within or outside of "High Quality Transit Areas (HQTAs)." An HQTA is defined as, "generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well-serviced transit stop with 15-minute or less service frequency during peak commute hours." HQTA boundaries are graphically portrayed in exhibits throughout the SCS. For the City of Los Angeles, the vast majority of the City's land area falls within HQTA boundaries, as seen in the following Exhibits: 4.4, 4.9, 4.13, 4.15, and Exhibits 19, 20 and 21 in the SCS Background Documentation (see Attachment).

These HQTA boundaries encompass all neighborhoods within a ½ mile radius and appear to indicate that growth will take place throughout the area, including low density single-family

neighborhoods and industrial districts. In fact, the City is far more discriminating, and adopted land use plans reflect carefully studied areas where growth can be absorbed. Generally, land use changes to accommodate growth are typically at transit stops and on parcels fronting transit corridors. Single-family neighborhoods are generally preserved.

Recommendation: The City recommends that additional explanation be included on pages 112-113 to better describe where growth is accommodated, as indicated by the following underlined text:

“A HQTAs is generally a walkable transit village or corridor, consistent with the adopted RTP/SCS , that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well-serviced transit stop with 15-minute or less service frequency during peak commute hours. This was represented by the proportion of Greenfield versus Refill (infill and redevelopment) growth in each of the scenarios. Within these boundaries, growth within a given jurisdiction is consistent with the integrated growth forecast for that jurisdiction and is distributed according to the jurisdiction’s land use plans. Thus, while areas within ½ mile of a transit stop or corridor are walkable in relation to transit, not all such areas are targeted for growth and/or land use changes.”

## **B. Urban Centers and Growth Patterns**

The SCS frames the overall land use pattern across the SCAG region around six factors. The HQTAs, discussed above, are one factor. Another factor is the region’s urbanized core versus peripheral areas. Urbanized core areas, or “core centers,” are defined in the SCS as, “areas where strategies such as compact community design, mixed-use development, redevelopment of aging retail areas, greater housing variety, and additional transit service are more likely to succeed.” Exhibit 4.5, Urban Centers SCAG Region (see Attachment), depicts the locations of these urban centers. However, these urban centers do not appear to align with the urban centers identified in Exhibit 4.15 for areas within the City of Los Angeles.

Recommendation: The City recommends that the relationship between Exhibit 4.5 and Exhibit 4.15 be clearly described. If the two exhibits are intended to illustrate the same urbanized areas, staff recommends that the color scheme used in Exhibit 4.15 also be used in Exhibit 4.5.

## **C. Land Uses around Station Areas**

The SCS projects higher density in urban centers, and anticipates growth in transit rich areas throughout the City of Los Angeles in order to demonstrate a decrease in GHG emissions by 2035. DCP staff compared the city’s General Plan Land Use to the SCS Land Use Pattern Maps and has found that in general the SCS is consistent with the City’s land use density and land use designations. However, in closely examining 76 rail and bus transit station areas, DCP staff has found instances of inflated density, which inaccurately reflects the General Plan distribution of growth.

Exhibit 21 Land Use Pattern Map 2035 (see Attachment) identifies urban centers with densities that are not consistent the community plans for these areas. Such centers would have residential densities ranging from 82 to 120 housing units or more per acre. This density is typical in the Central City and some adjacent neighborhoods, and is proposed for the Warner Center, but it is generally not appropriate throughout the rest of the city.

In addition, the following issues were found in multiple station areas.

**Multi-Family neighborhoods**

Densities up to 178, 145, or 61 units/acre that are too high for many sites

Densities too high in areas adjacent to single-family neighborhoods

**Single-Family neighborhoods**

Increase in density in strictly single-family areas that are stable and where no growth is anticipated

Parcels and Corridors in Historic Preservation Overlay Zones reflect density designations that are too high; these areas are stable with no projected change

Residential uses reflected as commercial

**Commercial Corridors**

Density projections are too high

**Industrial Land Use**

Industrial areas that are to be preserved as industrial are inaccurately represented as commercial or retail

Industrial areas that show residential designations are an inaccurate reflection as these sites are preserved

**Public Facilities**

Land use changes at school sites that are not projected to change

High residential densities or commercial uses projected on public facilities such as along freeways, county jail, open space

Recommendation: The City recommends that more appropriate representations of land use around station areas be made, which can be identified on detailed annotated maps of the station areas and provided under separate cover.

## **D. Proposed Bikeways**

The SCS emphasizes the importance of active transportation options in meeting the mobility needs of the SCAG region, including walking and biking. While SCAG has proposed a regional bikeway network, the SCS includes the contributions of localities in developing bicycle networks within the locality and linking to other transit modes, reflected in Exhibit 4.11 Proposed Bikeway Network SCAG Region (see Attachment). However, it appears that the City of Los Angeles' recently adopted 2010 Bicycle Plan for 1,684 miles of bike facilities across Los Angeles is not included in this Exhibit. Some segments of this bicycle network are in development and have been identified for funding, and are therefore included in the 2012 RTP list of transportation investments. Including the full proposed bicycle network will support the long-term commitment to pursue resources for development of the network.

Recommendation: The City recommends that the SCS include the bicycle facilities identified in the City's 2010 Bicycle Plan.

### **E. CEQA Streamlining Incentives for Sustainable Land Use Patterns**

The 2012-2035 RTP/SCS directly addresses the opportunity for relief under the California Environmental Quality Act (CEQA). Under Senate Bill 375, the requirement to prepare a Sustainable Communities Strategy (SCS) was coupled with incentives to encourage sustainable development and implementation of an SCS. The incentives are comprised of relief under CEQA, such as streamlined documentation or exemption from environmental review requirements, for specific development types in specific locations, as long as such development is consistent with the land use reflected in the SCS. As any proposed development is considered by local jurisdictions, this CEQA relief is at the discretion of local jurisdictions. However, as written, the 2012-2035 RTP/SCS can be construed to indicate that CEQA relief is part of the land use plan and is available by right to all development that meets the qualifications.

Recommendation: The City recommends that the 2012-2035 RTP/SCS better reflect the opportunity for CEQA streamlining incentives through the following changes:

- 1) In the discussion of the mandate to prepare an SCS (page 106 of the 2012-2035 RTP/SCS), amend the last sentence of the second to last paragraph:  
"In addition, some projects consistent with the SCS are may be eligible for streamlined environmental review."
- 2) In Exhibits 4.1, 4.2 and 4.3 regarding population, employment and household growth, respectively (see Attachment), remove the depiction of Transit Priority Project (TPP) areas. A TPP is one particular type of development that qualifies for CEQA streamlining. Depicting this in these exhibits is confusing because a TPP is not defined. Furthermore, the depiction of TPP boundaries detracts from the purpose of the exhibits, which is to show where growth is directed over the planning period of the 2012-2035 RTP/SCS.
- 3) In the discussion of Transportation Analysis Zones (TAZs) and Development Types (page 122 of the 2012-2035 RTP/SCS), remove the brief discussion regarding CEQA streamlining and the adequacy of TAZ-level land use information. First, this point is difficult to understand as presented and requires further explanation. Second, this point pertains to incentives available to jurisdictions and developers, not to the modeling analysis. Lastly, this point detracts from the purpose of the section, which is to describe the approach to modeling land use and transportation information. This paragraph would thus read:  
"To conduct required modeling analysis for the RTP/SCS, SCAG distributes the growth forecast data to transportation analysis zones (TAZs) to capture localized effects of the interaction of land use and transportation. Additionally, SB 375 offers local governments potential CEQA relief for qualified development projects consistent with an

~~adopted SCS. SCAG suggests that utilizing community types at the TAZ level of geography (with an average size of 160 square acres) offers local jurisdictions adequate information and flexibility to make appropriate consistency findings for projects to be eligible to receive CEQA streamlining benefits.~~

To further facilitate regional modeling of land use information from nearly 200 separate jurisdictions, SCAG developed a simplified series of Community Types to represent the land use categories taken from the region's many general plans..."

- 4) A reference to the summary of the CEQA incentive (page 148 of the 2012-2035 RTP/SCS) should be included under the section "RTP/SCS Next Steps" and the summary should be moved to follow this because the incentive can be used to encourage and facilitate implementation of the SCS and is therefore better understood as a "next step." In addition, the summary should include a discussion regarding a jurisdiction's discretion in certifying the environmental review for a project, regardless of eligibility for streamlining.
- 5) In the SCS Background Documentation, the summary of the CEQA exemption (page 84) should include a description of a jurisdiction's discretion in certifying the environmental review for a project, regardless of eligibility for streamlining.

Thank you for this opportunity to provide comments. If you have any questions or would like additional information, please contact Naomi Guth at (213) 978-3307 or by email at [Naomi.Guth@lacity.org](mailto:Naomi.Guth@lacity.org).

Sincerely,

MICHAEL J. LOGRANDE  
Director of Planning

Attachment

CC: Ken Bernstein, Principal City Planner  
Naomi Guth, City Planning Associate

EXHIBIT 4.4 Compass Blueprint Demonstration Projects

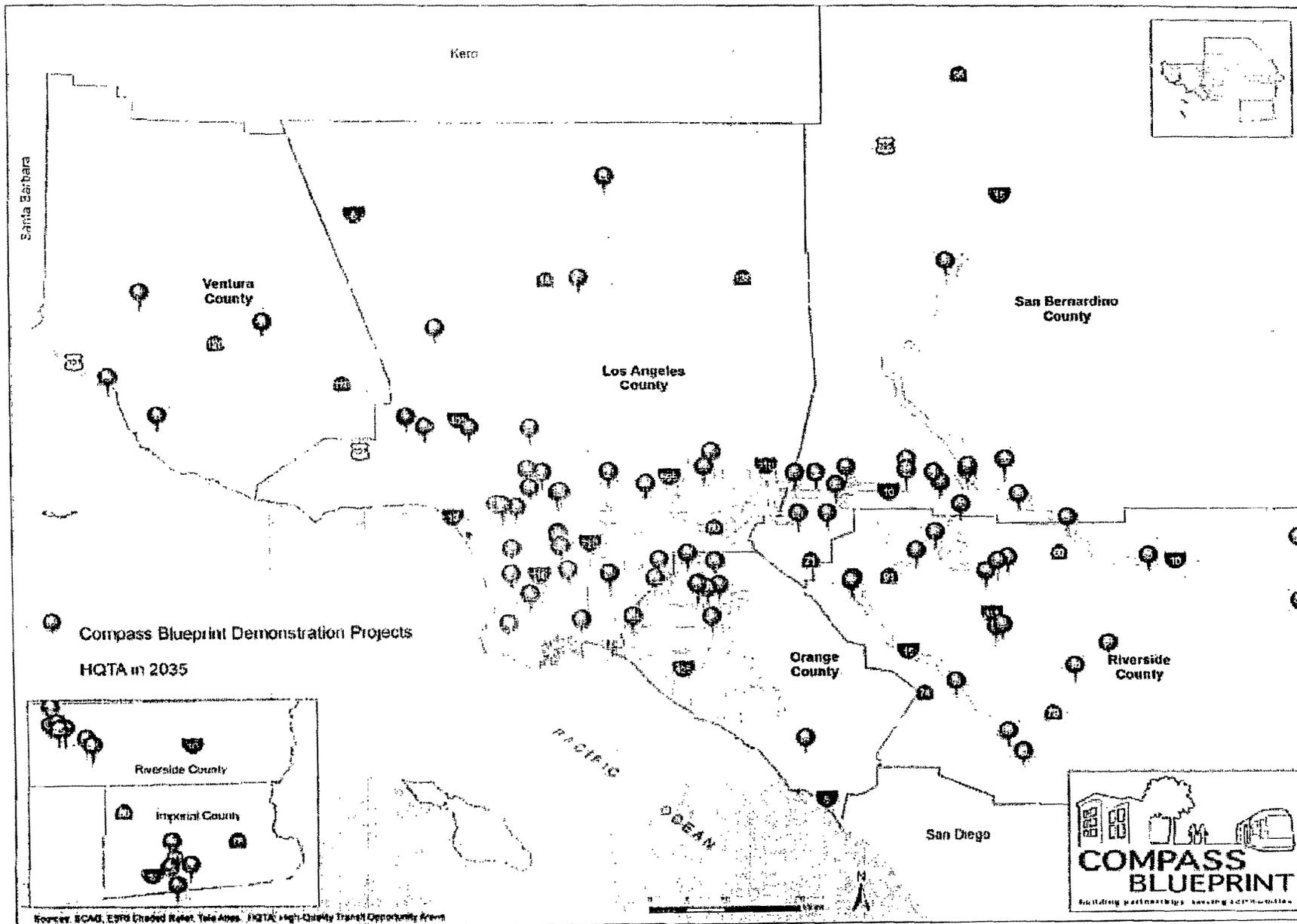


EXHIBIT 4.9 High-Quality Transit Areas (HQTAs) SCAG Region

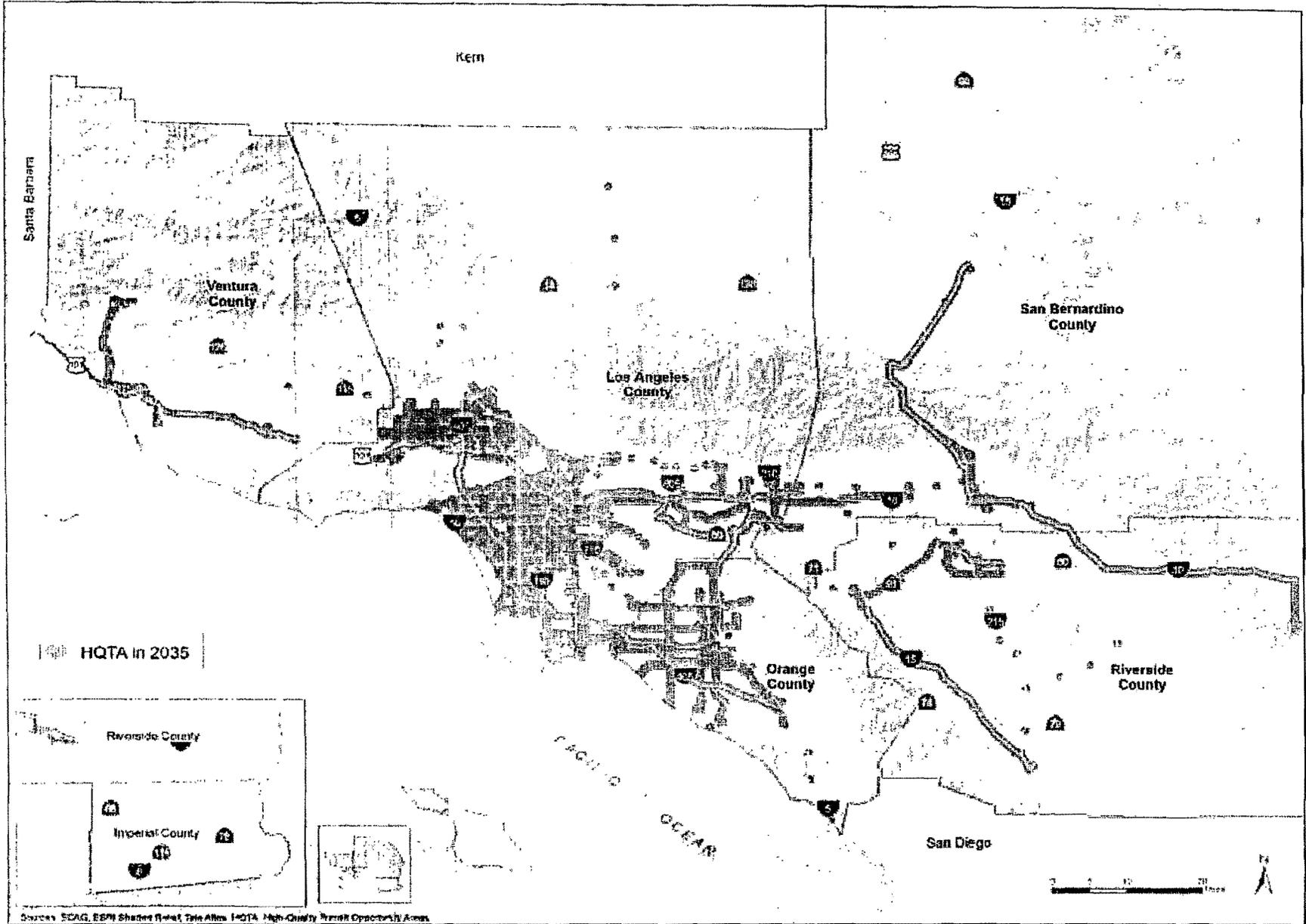


EXHIBIT 4.13 Land Use Pattern SCAG Region (2035)

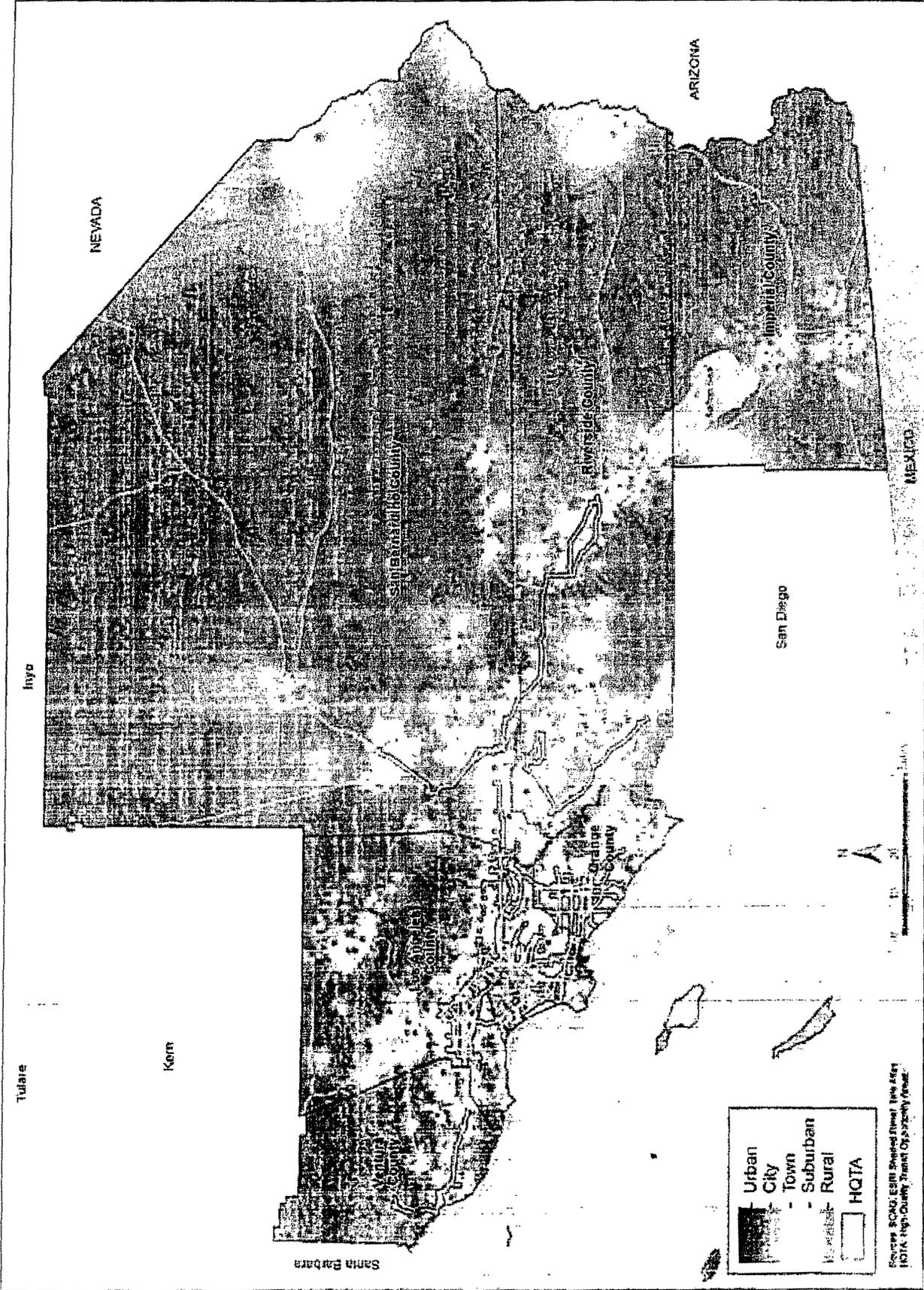


EXHIBIT 4.15 Land Use Pattern Los Angeles County (2035)

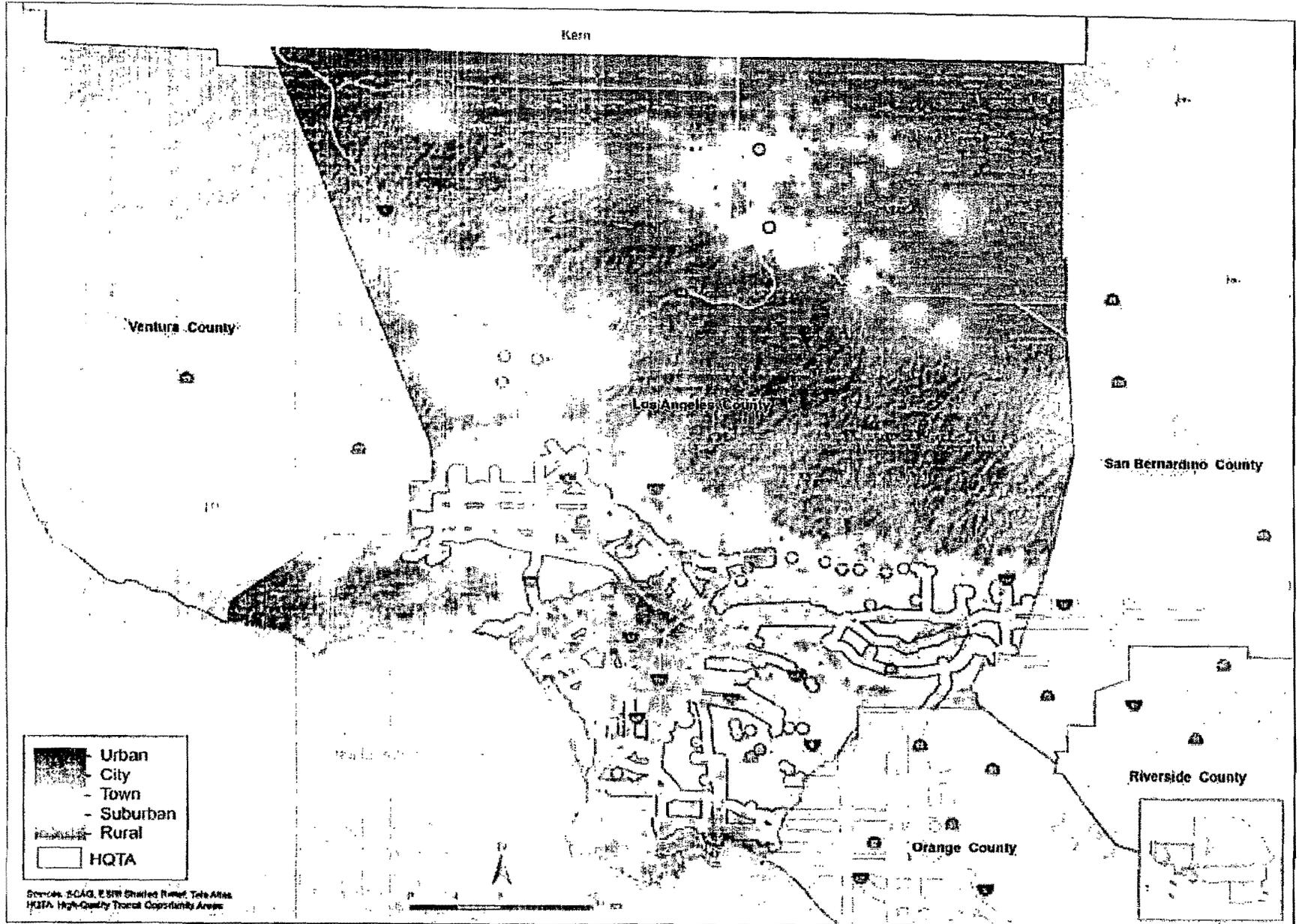


EXHIBIT 19 Land Use Pattern Map - City of Los Angeles 2008

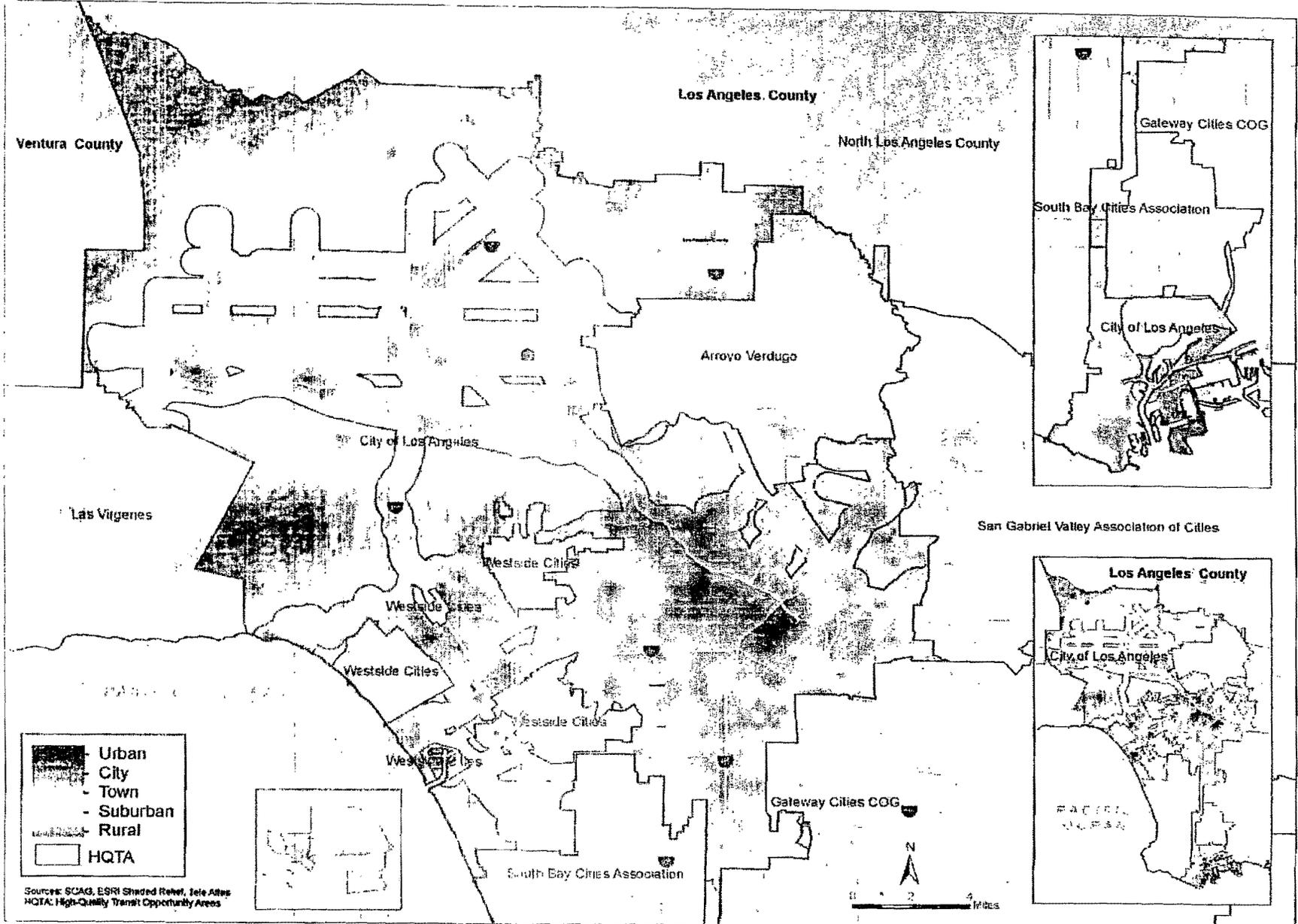


EXHIBIT 20 Land Use Pattern Map - City of Los Angeles 2020

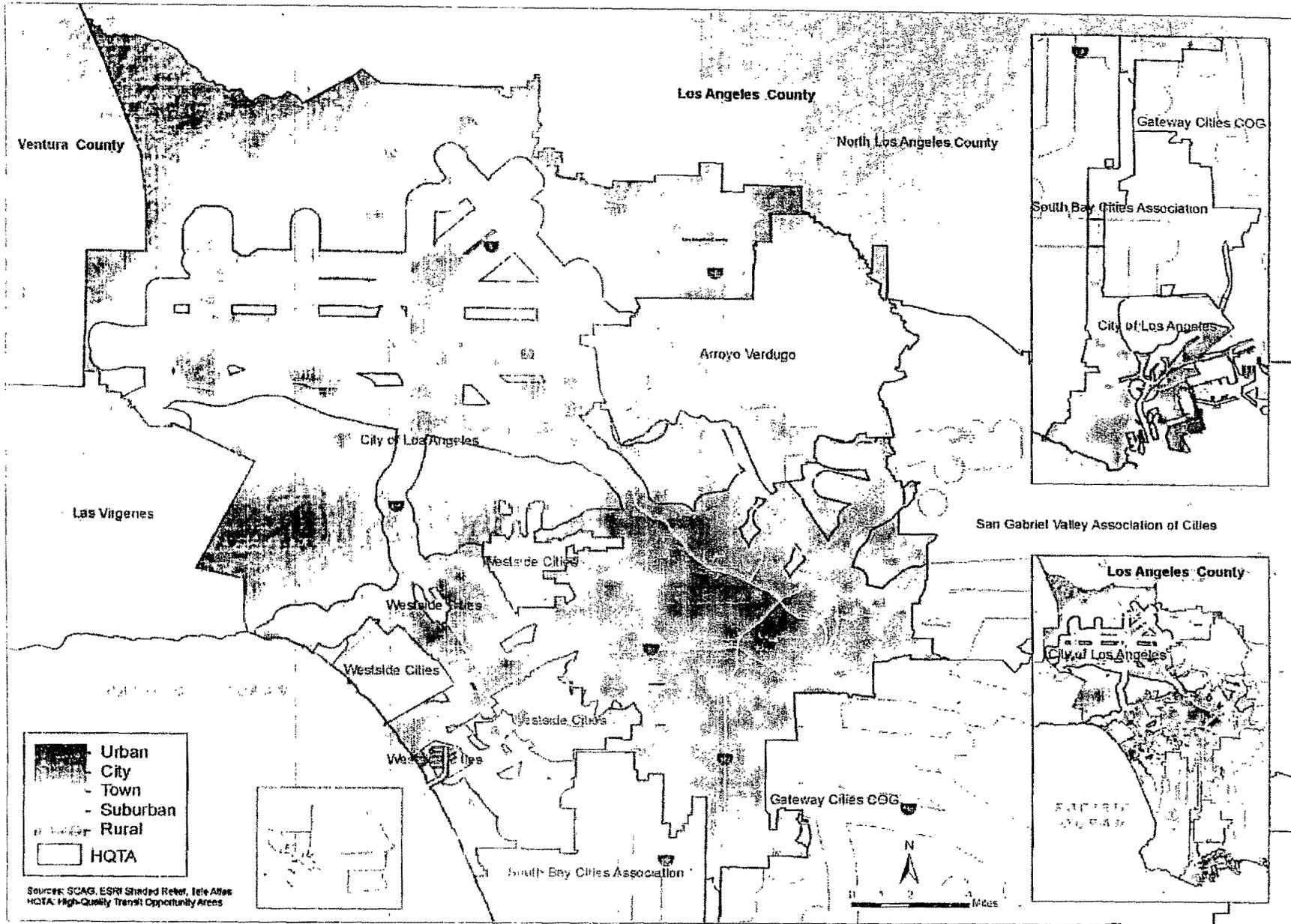


EXHIBIT 21 Land Use Pattern Map - City of Los Angeles 2035

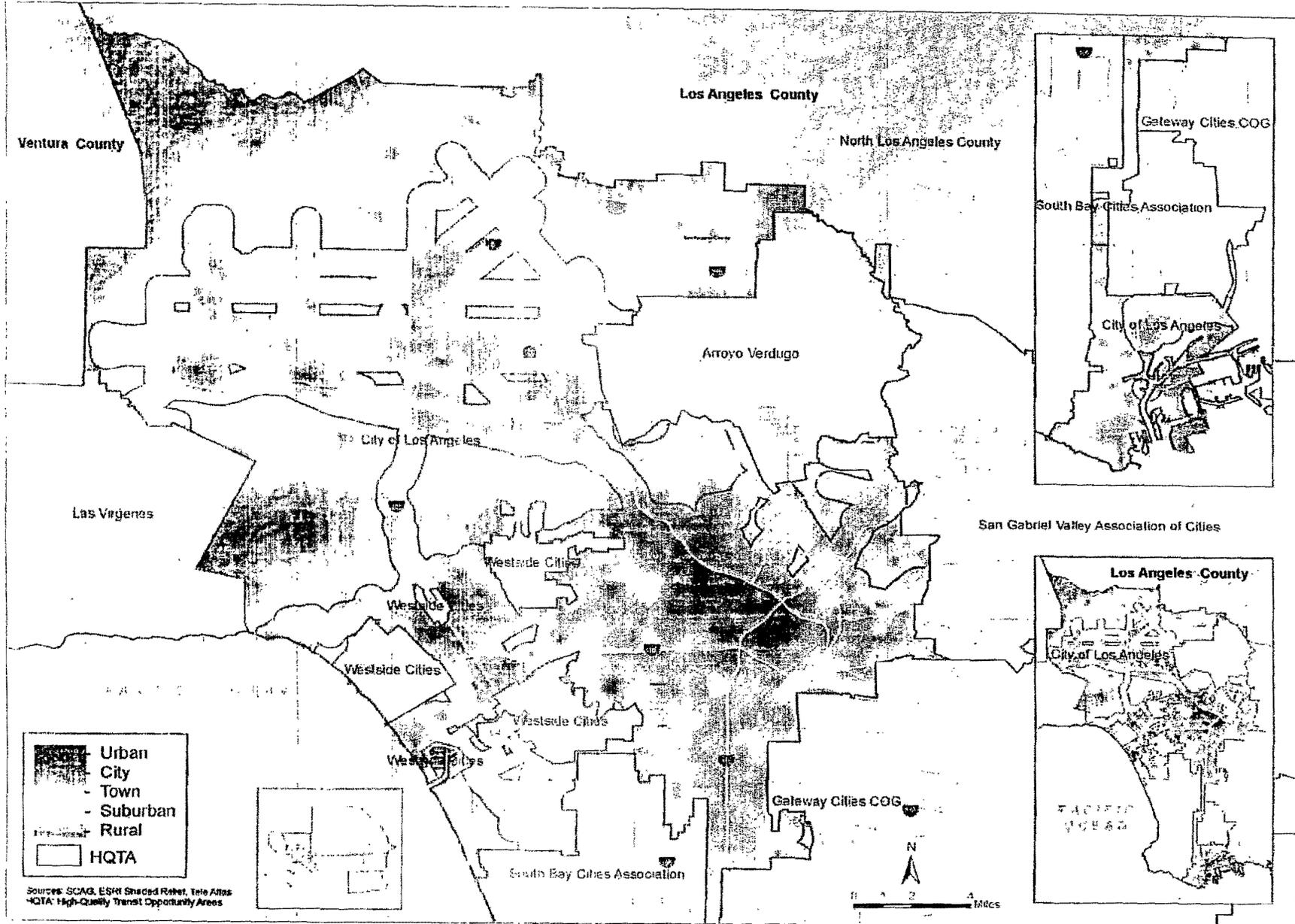
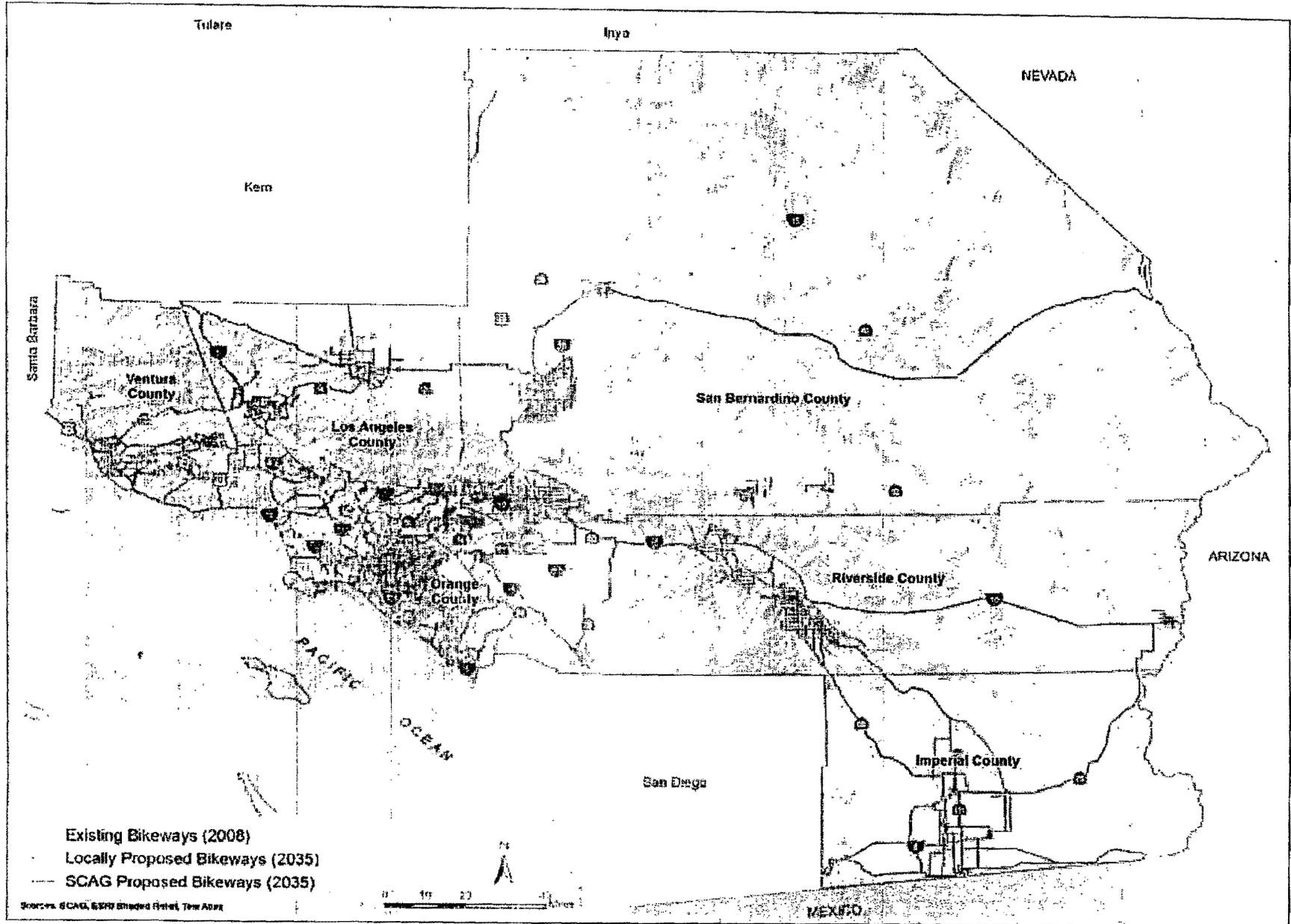




EXHIBIT 4.11 Proposed Bikeway Network SCAG Region



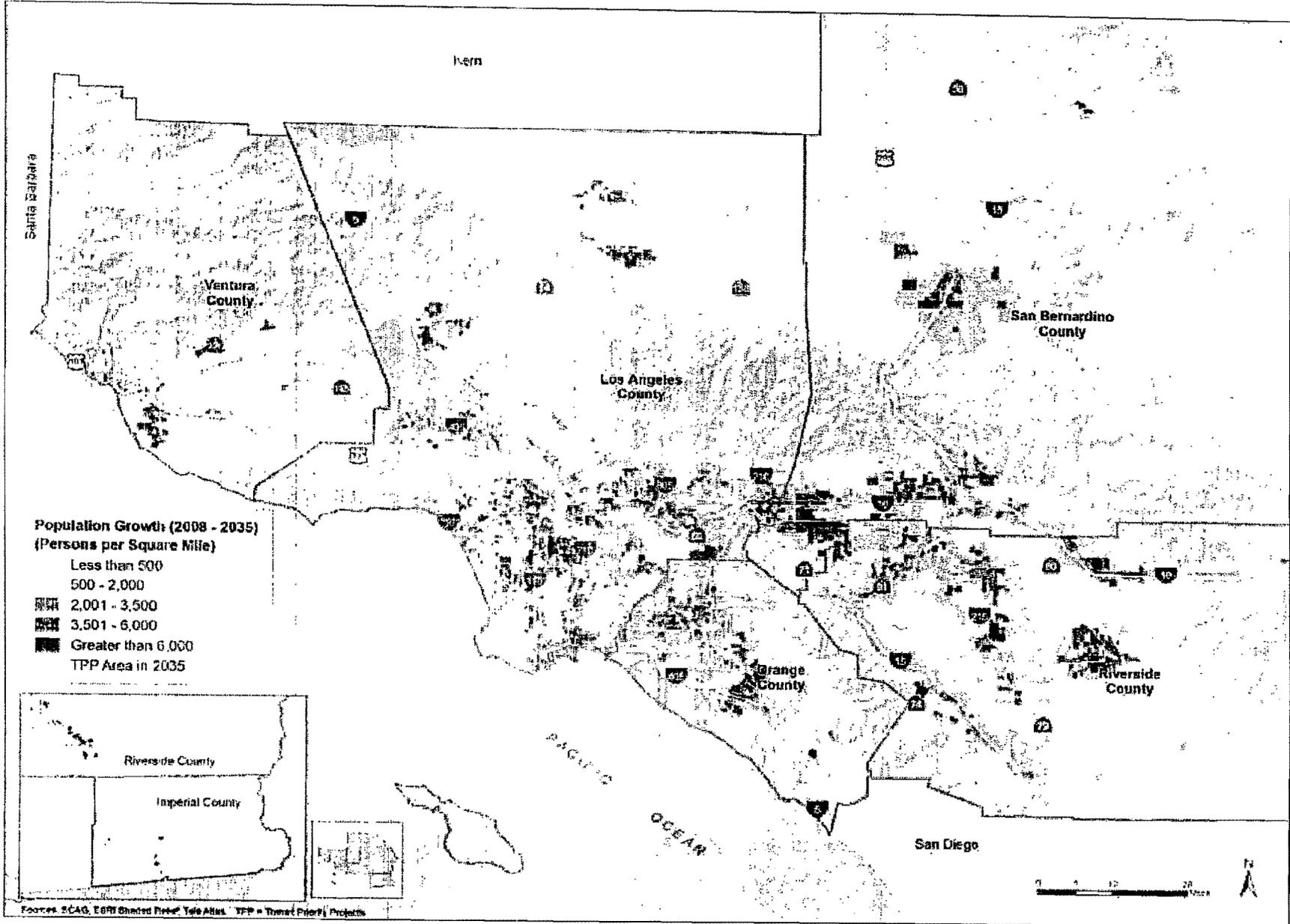
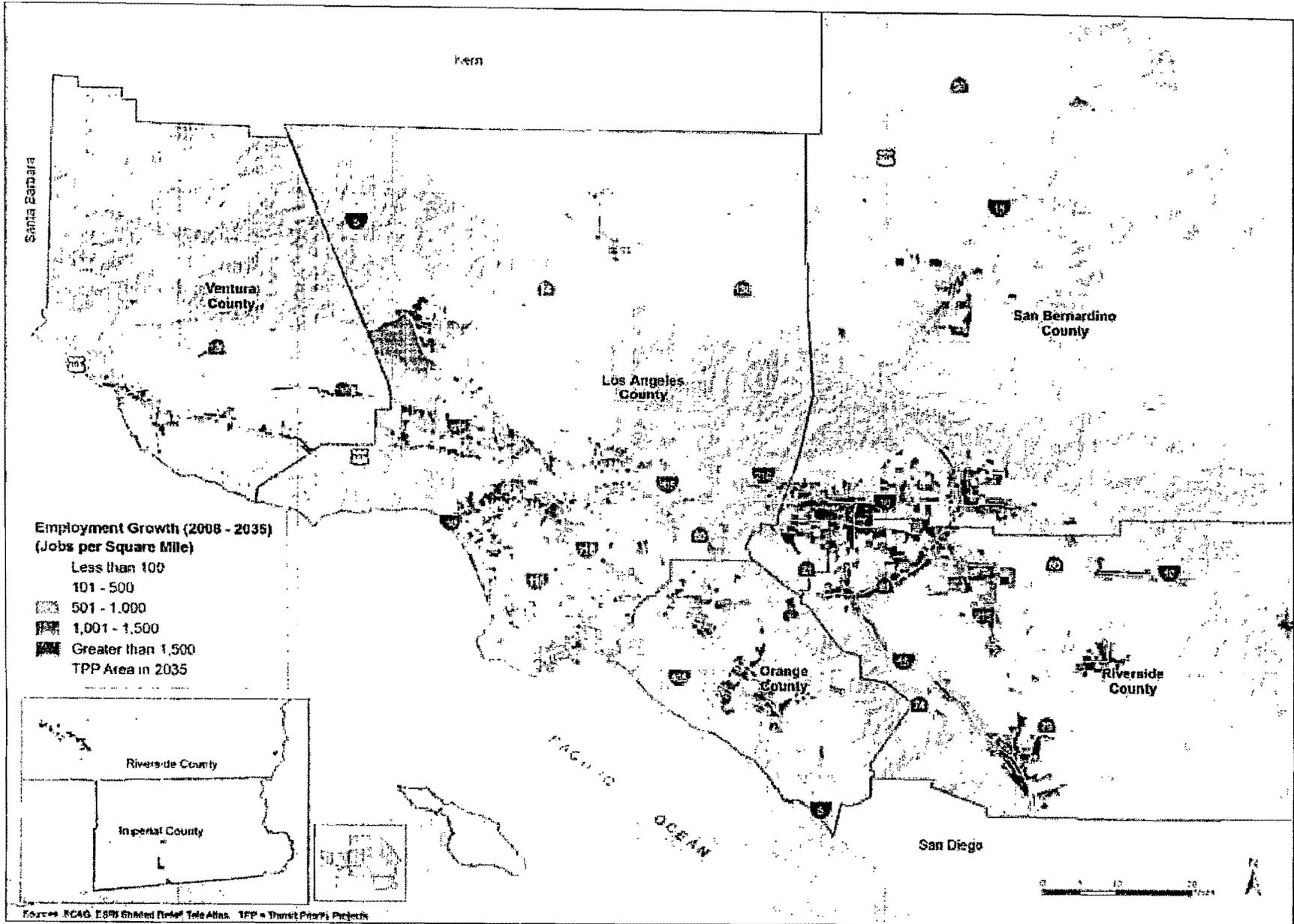
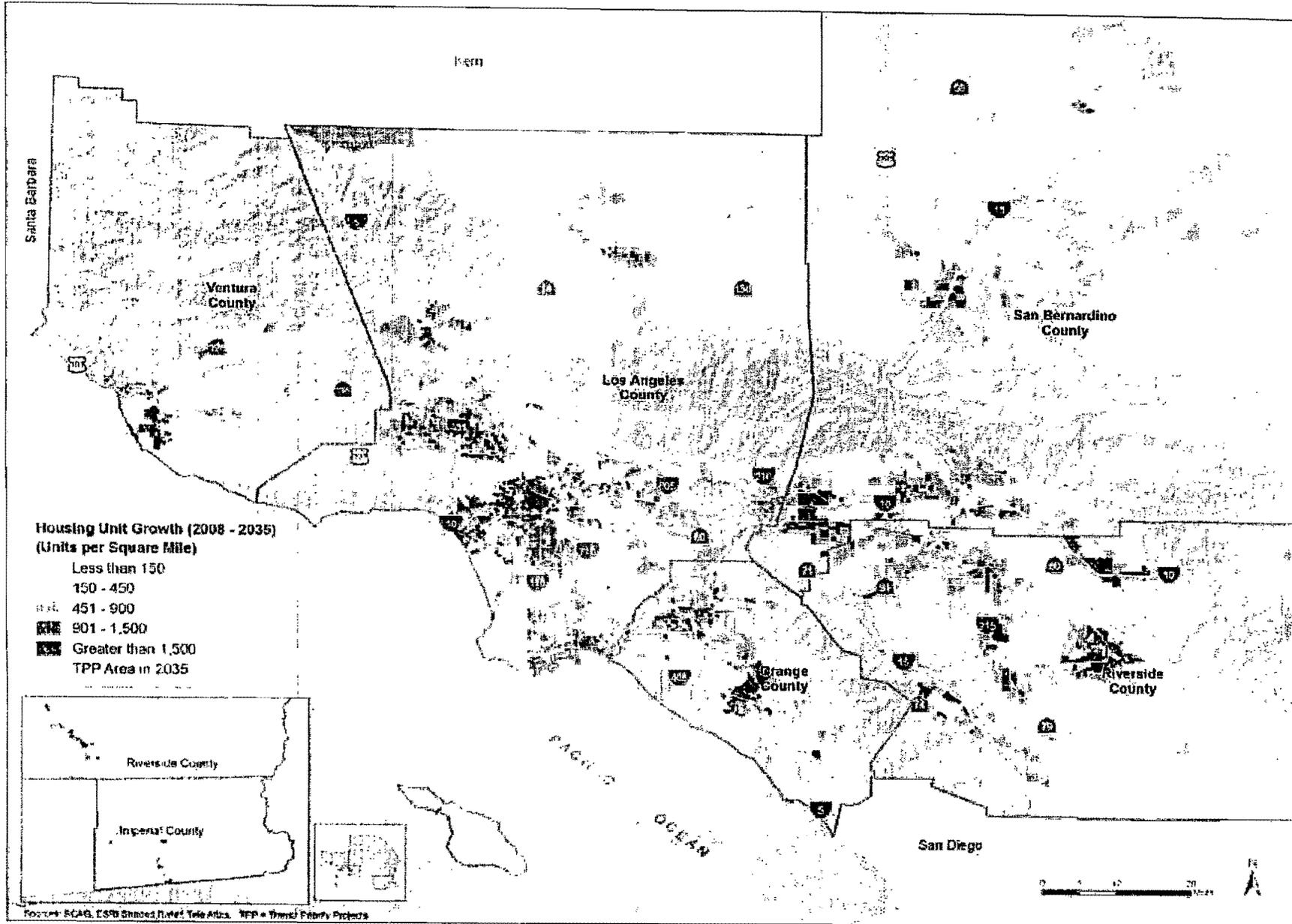


EXHIBIT 4.2 Employment Growth SCAG Region (2035)





## City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS (Attachment E)

Strategic Projects							
County	System	Category	Route Name	From/At	To	Project Description	Lead Agency
Los Angeles	Local Highway	Capacity	11th Street	Aviation Blvd	La Cienega Blvd	Widen and restripe to accommodate two through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Alameda Street	US-101 Fwy	I-10 Fwy	Widen to 70 ft and remove embedded rails and ties, install left turn channelization and widen curb returns to reduce congestion and improve truck movement	Los Angeles City
Los Angeles	Local Highway	Capacity	Alameda Street	I-10 Fwy	7th St	Alameda St. from I-10 to Seventh St. - project includes rehabilitation of the roadway, removing embedded rails and ties, installing left turn channelization, spot widening where needed to accommodate truck traffic	Los Angeles City
Los Angeles	Local Highway	Capacity	Alhambra Avenue	Lowell Ave	City of Alhambra city limits	Realign Alhambra Ave. between Lowell Ave. and the City of Alhambra city limits to smooth out an existing sharp s-curve and to enhance traffic and capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Anaheim Street	Farragut Ave	Dominguez Channel	Widen Anaheim St. from 78' to 84' and restripe to accommodate an additional lane in each direction; this would improve the roadway from 4 lanes to 6 lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Aviation Boulevard	Arbor Vitae St	Imperial Hwy	Widen and restripe to accommodate three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Balboa Boulevard	Devonshire St		Widen east side of Balboa Blvd. south of Devonshire St. for approximately 500 ft., and restripe the intersection to provide dual left-turn lanes for the northbound and southbound approaches.	Los Angeles City
Los Angeles	Local Highway	Capacity	Barham Boulevard	US-101 Fwy Bridge		Replace the existing bridge to increase traffic capacity and widen/restripe southbound US-101 off-ramp at Barham Blvd to provide southbound double left turn lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Barham Boulevard	Coral Dr		Widen west side of Barham Blvd. to provide a southbound right-turn only lane on Barham Blvd. and to improve access to Universal Studios and to the 101 NB on-ramp.	Los Angeles City
Los Angeles	Local Highway	Capacity	Beverly Glen Boulevard	Mulholland Dr		Widen south leg of Beverly Glen Blvd to create a right turn only lane; ROW acquisition needed	Los Angeles City
Los Angeles	Local Highway	Capacity	Brandford Street	Laurel Canyon Blvd	Amboy Ave	Widen north side of Brandford St. to provide an additional westbound lane.	Los Angeles City
Los Angeles	Local Highway	Capacity	Broad Avenue	Harry Bridges Blvd	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 side of Broad Ave	Los Angeles City
Los Angeles	Local Highway	Capacity	Bundy Drive	I-10 Fwy ramps		Reduce congestion on Bundy by reconfiguring the I-10 WB ramps (consolidate to one ramp location accommodating both the on and off ramps with new signal)	Los Angeles City
Los Angeles	Local Highway	Capacity	Burbank Boulevard	Clybourne Ave	Vineland Ave	Widen Burbank Blvd. to a major highway standard (80-foot roadway width) on both sides of street to improve roadway capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Burbank Boulevard	US-101 Fwy WB		Widening to add second westbound through lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Canoga Avenue	US-101 WB off-ramp		Widen westbound off-ramp to provide a right turn only lane to Canoga Ave	Los Angeles City
Los Angeles	Local Highway	Capacity	Canoga Avenue	Burbank Blvd		Widening to add a second westbound left-turn lane and a dedicated northbound right-turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Transit	Canoga Avenue	Ventura Blvd	Canoga Orange Line Station	Purchase 20 new buses to add to a Local Circulator bus system between Ventura Boulevard and Canoga Orange Line Station. Install new bus shelters and/or enhance the existing bus shelters along the route as required.	Los Angeles City
Los Angeles	Local Highway	Capacity	Canoga Avenue	Saticoy St		Widening to add southbound through lane. Change southbound and eastbound phasing from left-turn permitted to protected.	Los Angeles City
Los Angeles	Local Highway	Capacity	Coldwater Canyon Boulevard	Ventura Blvd	Magnolia Blvd	Remove jut-outs to add one through lane in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Corbin Avenue	Victory Blvd		Widening to add eastbound and westbound through lanes and upgrade traffic signal	Los Angeles City

## City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS (Attachment E)

County	System	Category	Route Name	Strategic Projects		Project Description	Lead Agency
				From/At	To		
Los Angeles	Local Highway	Capacity	Crenshaw Boulevard	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	Los Angeles City
Los Angeles	Local Highway	Capacity	Culver Boulevard	Centinela Ave	I-405 Fwy	Improve traffic flow along Culver Blvd between Centinela Ave and I-405 Freeway including providing left-turn lanes at key signalized intersections (including Inglewood Blvd)	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Avenue	Ventura Blvd	Clark St	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Avenue	Saticoy St		Widening to add eastbound and westbound right turn lanes and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Street	Parthenia St		Widening to add dedicated eastbound westbound right turn lane and northbound phasing from left-turn permitted to protected	Los Angeles City
Los Angeles	Local Highway	Capacity	De Soto Street	Califa St		Widening to add northbound and westbound right-turn lanes and install new traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Enterprise Street	Mateo St (near WB I-10 off-ramp)		Widen Enterprise St at Mateo St (near WB-10 off-ramp) to improve truck movement at curb returns	Los Angeles City
Los Angeles	Local Highway	Capacity	Fallbrook Avenue	Victory Blvd		Widening to add westbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Figueroa Street	146th St	Redondo Beach Blvd	Widen Figueroa St to major highway standard from 62 ft to 80 ft to provide three lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Fletcher Street Bridge	LA River		Widen to increase capacity and improve access to I-5 Fwy; add bike lanes and sidewalks	Los Angeles City
Los Angeles	Local Highway	Capacity	Foothill Boulevard	Balboa Blvd		Widen north of Balboa Blvd over culvert and widen west leg of Foothill Blvd at Balboa Blvd. Upgrade traffic signal to improve intersection capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	Forest Lawn Drive	near SR-134 Bridge	/LA River	Construct a new bridge with bike path (including equestrian trail) over LA River at LAEC. Re-align the SR-134 freeway on/off ramps at Forest Lawn Dr. to improve flow and capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	Fountain Avenue	Sunset Blvd	Western Ave	Widen Fountain Ave to add a left-turn lane at each intersection-ROW acquisition needed	Los Angeles City
Los Angeles	Local Highway	Capacity	Glenoaks Boulevard	Sunland Blvd		Widen Glenoaks Blvd to provide an eastbound right-turn lane	Los Angeles City
Los Angeles	Local Highway	Capacity	Grand Avenue Bridge	Cesar Chavez Ave	Temple St	Widen bridge over US-101 Fwy to improve access to US-101, SR-110, future school and Grand Ave	Los Angeles City
Los Angeles	Local Highway	Capacity	Grand Avenue Bridge	Over US 101 Fwy		Widen the Existing bridge to provide dual left-turn lane onto the 101 and 110 freeways on-ramps, includes, and add through lane and right-turn lane, and widen sidewalk	Los Angeles City
Los Angeles	Local Highway	Capacity	Imperial Highway	Sepulveda Blvd	Pershing Dr	Widen to provide continuous three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Irwin Street	Owensmouth Ave	De Soto St	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	La Cienega Boulevard	Arbor Vitae St	111th St	Widen and restripe to accommodate three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	La Tijera Boulevard	Airport Blvd	La Cienega Blvd	Widen and restripe to provide continuous three through lanes in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Laurel Canyon Boulevard	Mulholland Dr		Widen the west side of Laurel Canyon Blvd south of Mulholland Dr to carry two southbound lanes through the intersection	Los Angeles City
Los Angeles	Local Highway	Capacity	Lincoln Boulevard	Jefferson Blvd	Fiji Way	Partnering with Caltrans & LA County, improve Lincoln Blvd between Jefferson Blvd & Fiji Way including removing the existing bottleneck by replacing/widening the existing bridge to provide an add'l lane in each direction & on-street bike lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Maclay Street	Gladstone Ave		Remove jut-outs on Maclay at Gladstone and install a new traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Magnolia Boulevard	Cahuenga Blvd	Vineland Ave (north side)	Widen the north side of Magnolia Blvd. to provide an additional lane in the westbound direction.	Los Angeles City

## City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS (Attachment E)

Strategic Projects							
County	System	Category	Route Name	From/At	To	Project Description	Lead Agency
Los Angeles	Local Highway	Capacity	Mason Avenue	Saticoy St		Widening to add Exclusive right-turn lanes for all approaches and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Mission Road	Griffin Ave	Marengo St	Widen Mission Road to provide an additional through lane in each direction, and install new pedestrian signal at Sichel Street	Los Angeles City
Los Angeles	Local Highway	Capacity	Moorpark Avenue	Woodman Ave	Mammoth Ave	Widen Moorpark Ave. to increase capacity and install street lights, curb, and gutter.	Los Angeles City
Los Angeles	Local Highway	Capacity	North Main Street	Albion St		Grade separate North Main Street over the exiting Metrolink and freight tracks; reduces delays for vehicles and transit riders traveling on Main Street	Los Angeles City
Los Angeles	Local Highway	Capacity	North Spring Street	Roundout St	Baker St	Widen N. Spring St. between Roundout St. to Baker St. from 44 ft. to an 80' roadway width and install landscaped medians	Los Angeles City
Los Angeles	Local Highway	Capacity	Olympic Boulevard	Soto St		Improvements to the intersection by increasing the curb return radius of all four corners and Olympic Blvd approaches. ROW required	Los Angeles City
Los Angeles	Local Highway	Capacity	Olympic Boulevard	Alameda St		Widen to improve truck movement (right-of-way required)	Los Angeles City
Los Angeles	Local Highway	Capacity	Olympic Boulevard	Santa Fe Ave		Widening curb retrun to improve truck movement through the intersection.	Los Angeles City
Los Angeles	Local Highway	Capacity	Owensmouth Avenue	Canyon Creek Dr (Private)		Widening to add southbound and eastbound right-turn lanes, add a northbound left-turn lane, and upgrade traffic signal.	Los Angeles City
Los Angeles	Local Highway	Capacity	Owensmouth Avenue	Saticoy St		Widening to add northbound left-turn and upgrade traffic signal.	Los Angeles City
Los Angeles	Local Highway	Capacity	Oxnard Street	White Oak Ave	Lindley Ave	Oxnard Street widening from 75 ft. exiting ROW to 100 ft. (Require additional ROW) to allow through lane in each direction	Los Angeles City
Los Angeles	Local Highway	Capacity	Oxnard Street	AMC Dwy	De Soto St	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Reseda Boulevard	Burbank Blvd	US-101 Fwy WB ramps	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Riverside Drive	SR-134 Fwy		Widen the bridge to improve the capacity and to add the bike lane	Los Angeles City
Los Angeles	Local Highway	Capacity	Robertson Avenue	National Blvd	I-10 Fwy Interchange	Reconfigure existing ramps and construct new ramps to improve capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	Roxford Street	Sepulveda Blvd		Realign Roxford St. at Sepulveda Blvd. by widening curb radius to enhance traffic flow.	Los Angeles City
Los Angeles	Local Highway	Capacity	San Fernando Road	Sierra Hwy	Roxford St	Install a center-reversible lane on the Old Road to provide extra capacity during peak hours along an approximately 3 mile segment.	Los Angeles City
Los Angeles	Local Highway	Capacity	Santa Fe Avenue	Porter St		Widening curb retrun to improve truck movement through the intersection.	Los Angeles City
Los Angeles	Local Highway	Capacity	Saticoy Street	Van Nuys Blvd	Woodman Ave	Construct grade separation and extend roadway westerly from Woodman Ave to Van Nuys Blvd	Los Angeles City
Los Angeles	Local Highway	Capacity	Sepulveda Boulevard	National Blvd	Olympic Blvd	Widen to major highway standard and increase number of through lanes from two to three lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Sepulveda Boulevard Corridor	Wilshire Blvd	LAX	Partnering with Culver City & LA County, identify and implement ways of improving traffic flow, carrying capacity, and efficiency in the utilization of the Sepulveda Corridor from Wilshire to LAX.	Los Angeles City
Los Angeles	Local Highway	Capacity	Sepulveda Tunnel	Mulholland Bridge		Widen existing tunnel to provide additional traffic lanes and bike lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Sherman Way Avenue	Jordan Ave	De Soto St	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Shoup Avenue	Inwin Ave		Widening to add northbound right turn lane and upgrade traffic signal to include northbound protected left-turn phasing	Los Angeles City

**City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS (Attachment E)**

Strategic Projects							
County	System	Category	Route Name	From/At	To	Project Description	Lead Agency
Los Angeles	Local Highway	Capacity	Shoup Avenue	Oxnard St		Widening to add northbound right turn lane and upgrade traffic signal to include westbound and northbound protected left-turn phasings	Los Angeles City
Los Angeles	Local Highway	Capacity	Shoup Avenue	Vanowen St		Widening to add eastbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Shoup Avenue	Sherman Way		Widening to add northbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Slauson Avenue	Crenshaw Blvd	Alameda St	Design and construction of street improvements and signage for local and regional traffic.	Los Angeles City
Los Angeles	Local Highway	Capacity	Topanga Canyon Boulevard	Mulholland Dr		Widening to add a southbound right-turn lane and upgrade traffic signal to include southbound right-turn overlap phase	Los Angeles City
Los Angeles	Local Highway	Capacity	Topanga Canyon Boulevard	Roscoes Bvd		Widening to add northbound left-turn and southbound right-turn lanes and traffic signal upgrade.	Los Angeles City
Los Angeles	Local Highway	Capacity	Topanga Canyon Boulevard	Vanowen St	Ventura Blvd	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity. Install new signal at Topanga Canyon Blvd. and Califa St	Los Angeles City
Los Angeles	Local Highway	Capacity	Vaiel Avenue	Kittridge St		Widening to add eastbound and westbound through lanes and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Valley Boulevard	San Pablo St	Boca Ave	Improve capacity and enhance traffic flow at railroad crossing by widening to add lanes, to improve curb, and to upgrade signal systems and rail road equipment along Valley Blvd.	Los Angeles City
Los Angeles	Local Highway	Capacity	Van Ness Avenue	US-101 Fwy SB off-ramp	Sunset Blvd	Widen both sides of Van Ness Ave. to accommodate one additional southbound lane.	Los Angeles City
Los Angeles	Local Highway	Capacity	Vanalden Avenue	US-101 Fwy EB ramps	Ventura Blvd	Widening to add westbound through lane and upgrade traffic signal to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Capacity	Vanowen Avenue	Owensmouth Ave	Mason Ave	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity.	Los Angeles City
Los Angeles	Local Highway	Transit	Variel Avenue	Oxnard St		Construction of a 4th Orange Line Station in Warner Center Area	Los Angeles City
Los Angeles	Local Highway	Capacity	Ventura Boulevard	Shoup Ave	US-101 SB ramps	Widen between Shoup Ave and US-101 freeway southbound ramps to provide double left-turn lanes	Los Angeles City
Los Angeles	Local Highway	Capacity	Vermont Avenue	Washington Blvd	I-10 Fwy WB off-ramp	Widen 10 ft. of east-side of Vermont Ave to provide left-turn lane	Los Angeles City
Los Angeles	Local Highway	Transit	Victory Boulevard	Owensmouth Ave to Oxnard	Variel Ave to Victory Blvd	Purchase 20 new buses to add to a Local Circulator bus system to operate from Victory to Owensmouth to Oxnard to Variel and back to Victory. Install new bus shelters and/or enhance the existing bus shelters along the route as required	Los Angeles City
Los Angeles	Local Highway	Capacity	Victory Boulevard	Owensmouth Ave	Winnetka Ave	Intersection widening to add through and/or turn lanes, and upgrade traffic signal to include new phasing as needed to improve intersection capacity	Los Angeles City
Los Angeles	Local Highway	Capacity	Western Avenue	Florence Ave	80th St/Manchester Ave	Widen east side of Western Ave. to accommodate left-turn lanes at various intersections within the project limits.	Los Angeles City
Los Angeles	Local Highway	Capacity	Western Avenue	Exposition Blvd		Widen Western Blvd. to add northbound and southbound left-turn lanes at Exposition Blvd.	Los Angeles City
Los Angeles	Local Highway	Capacity	Wilshire Boulevard	San Vicente Blvd	Centinela Ave	Arterial widening to provide an additional lane in each direction.	Los Angeles City
Los Angeles	Local Highway	Capacity	Winnetka Avenue	Vanowen St		Widening to add northbound and southbound right-turn lanes and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Winnetka Avenue	Ventura Blvd		Change westbound right-turn lane to a shared through-right turn lane, add an eastbound left-turn lane, and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Winnetka Avenue	Oxnard St		Widening to add westbound right turn lane and upgrade traffic signal	Los Angeles City
Los Angeles	Local Highway	Capacity	Woodlake Avenue	Victory Blvd		Widening to add northbound shared-through right turn lane and upgrade traffic signal	Los Angeles City

**City of Los Angeles Projects Requested to be added to Strategic Plan - 2012 RTP/SCS (Attachment E)**

County	System	Category	Route Name	Strategic Projects		Project Description	Lead Agency
				From/At	To		
Los Angeles	Local Highway	Transit	Downtown L.A. Streetcar			Construct 4-mile fixed-rail urban streetcar circulator systems to serve downtown areas includes Bunker Hill, Grand Avenue and Music Center, Historic Broadway and the Historic Core, South Park, LA Live and the Los Angeles Convention Center.	Los Angeles City



# Board of Supervisors County of Los Angeles

MICHAEL D. ANTONOVICH  
SUPERVISOR

February 28, 2012

The Honorable Alan Wapner  
Chairman, Regional Transportation Plan Subcommittee  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017

Dear Chairman Wapner:

As a Los Angeles County Supervisor, Vice-Chair of the Los Angeles County Metropolitan Transportation Authority (MTA), and SCAG Board Director, it is my pleasure to request that this subcommittee recommend to the SCAG Regional Council the inclusion of a high speed rail study within the proposed High Desert Corridor project between Victorville and Palmdale as part of the Constrained Regional Transportation Plan.

The importance of the High Desert Corridor has been well-noted by the federal government, which designated the project as a "Corridor of National Significance" with its "E-220" designation in SAFETEA-LU. Support for this project started with the Counties of Los Angeles and San Bernardino partnering to create a Joint Powers Authority (JPA) to oversee the development of this corridor. Since this time the project has also been endorsed in the constrained portions of SCAG's Regional Transportation Plan, the Regional Transportation Improvement Plan, and the MTA Long Range Transportation Plan. The potential for this corridor to divert car and truck trips from the heavily-populated, congested and emissions-plagued Los Angeles and San Bernardino basins has gained national attention as a vital solution to the confluence of local, regional and national car and truck traffic within the region's current freeway system.

The High Desert Corridor JPA Board of Directors has always envisioned this corridor as a public-private partnership that would require multiple elements to create a multi-modal corridor that met the region's needs for car, truck and transit infrastructure improvement. Inclusion of a high-speed rail component within the right-of-way of the High Desert Corridor reflects the desire of the JPA Board of Directors to connect Palmdale and Victorville with at minimum an enhanced 110 mile-per-hour high speed Metrolink corridor, and potentially a 220 mile-per-hour high speed rail corridor compatible with both the California and DesertXpress High Speed Rail systems. Currently the JPA Board has not entered into any agreement with Metrolink, California High Speed Rail,

The Honorable Alan Wapner  
February 28, 2012  
Page 2

Amtrak or DesertXpress to partner with the JPA in operating service on this high speed rail corridor. Rather, the JPA will remain partner-neutral until which time the Public-Private Partnership Request for Proposals process calls for a decision to be made by the High Desert Corridor JPA and its partners in MTA and SANBAG.

By combining the environmental study of this high speed rail component of the High Desert Corridor into the current environmental work for the highway portion of the project, the JPA Board strives to provide a cost-effective manner of implementing this transit aspect of the project as cost-effectively as possible while staying within SCAG's envelope of \$8.2 billion in the proposed Regional Transportation Plan. By including a vital high speed rail component, the High Desert Corridor stands poised to become a model public-private partnership project which captures the multi-modal requirements of AB 32 and SB 375 while leveraging private capital and improving the national movement of truck freight as encouraged by federal transportation policy.

Thank you for your support of the inclusion of the High Desert Corridor, including the environmental study of a high speed rail component within its right-of-way, in the Constrained portion of SCAG's Regional Transportation Plan.

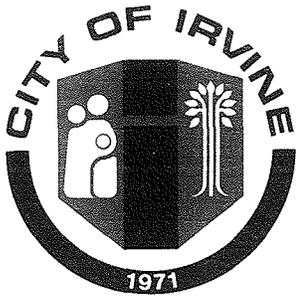
Sincerely,

A handwritten signature in black ink, appearing to read "Mike Antonovich". The signature is written in a cursive style with a large initial "M" and "A".

MICHAEL D. ANTONOVICH  
Supervisor

MDA:mcc

c: Members of the Regional Transportation Plan Subcommittee



SEAN JOYCE, City Manager

www.ci.irvine.ca.us

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 (949) 724-6249

February 13, 2012

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

**RE: Comments on the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy and Program Environmental Impact Report**

Dear Mr. Ikhata:

The City of Irvine appreciates the opportunity to review and provide comments on the Draft 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and Program Environmental Impact Report (PEIR). The City of Irvine commends the Southern California Association of Governments (SCAG) staff for the tremendous amount of work and effort in preparing these documents. The following general comments and recommendations are offered by the City of Irvine on the Draft 2012-2035 RTP/SCS, associated appendices, and the Draft PEIR. In support of this letter, please find attached more specific detailed comments from the City of Irvine related to the PEIR (Attachment 1) and technical comments from Orange County Council of Governments (OCCOG) (Attachment 2). The City of Irvine requests that this letter and all of its attachments be included in the public record as our collective comments on the Draft RTP/SCS, PEIR, associated documents, and online inventory of maps.

- **The City of Irvine concurs with the Orange County Council of Governments (OCCOG) and Orange County Transportation Authority comments.**

The City of Irvine concurs with the comments SCAG will receive from the OCCOG and the Orange County Transportation Authority (OCTA). The City requests that SCAG respond to all of the comments detailed in the OCCOG and OCTA letters and to act upon any changes advocated by OCCOG, of which the City is a member agency.

- **SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, not at a smaller level of geography such as city, census tract, or traffic analysis zone level.**

The growth projections provided to SCAG represent the best available information from local jurisdictions, the business community, and landowners. However, as time passes, what is feasible for any given project can change. A county level of geography accommodates internal adjustments to changing conditions, without compromising the integrity of the overall growth projections. Approving the growth projections at any lower level of geography, such as the city level, would be challenged with continual revisions and shifts to the total number of housing, population, and employment within a city, among cities, and between cities and counties. Adoption of the data at a level lower than the county would also limit local jurisdictional control and create inflexibility in a regional planning document.

- **The Orange County Sustainable Communities Strategy (OC SCS) should be fully integrated into the regional RTP/SCS. Language should be incorporated into the document that indicates the OC SCS represents the SCS for the Orange County subregion.**

The RTP and appendices include numerous references to the OC SCS and SCAG's total use of the document in the regional RTP/SCS. Yet numerous other references suggest SCAG may have modified elements of the OC SCS data. SCAG shall include a statement and should document all maps, tables, charts, and other information that is necessary to confirm all of the OC SCS land use, socioeconomic, and transportation data was incorporated into the regional RTP/SCS without changes. This would be consistent with statements made by SCAG staff to the OCCOG Board of Directors and at the 2012 RTP Workshops that the OC SCS data has not been and will not be altered. Furthermore, there should be a statement indicating that the OC SCS represents the SCS for the Orange County subregion in total and that anything to the contrary in the regional 2012 RTP/SCS shall have no standing for Orange County.

- **One City of Irvine project, which has both local and regional significance, does not appear to be included in the RTP/SCS. This project is identified in the Long Range Transportation Plan (LRTP) for Orange County with the Orange County Transportation Authority (OCTA) as lead agency. It is, therefore, requested that the following project be added to the RTP/SCS: Sand Canyon Grade Separation Project.**
- **All documents, tables, maps, narrative, modeling runs, and PEIR Alternatives (including Alternative C/3/Envision 2 referencing the Orange County growth forecasts) should be updated with Orange County**

**County growth forecasts) should be updated with Orange County Projections 2010 Modified Growth Projections (OCP-2010 Modified), as adopted by the OCCOG Board of Directors and consistent with the subregional delegation MOU between OCCOG, OCTA, and SCAG.**

Orange County Projections 2010 Modified (OCP-2010 Modified) was approved by the OCCOG Board of Directors on January 26, 2012 and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2012 Employment Development Department Benchmark data, consistent with SCAG's updated growth forecast dataset.

- **SCAG does not have the purview to implement or require mitigation for local jurisdictions, other agencies, and project sponsors. SCAG should remove all mitigation measures outside their purview and consider moving these "mitigation measures" to an appendix of the RTP/SCS that can be used by local jurisdictions, local agencies, and project sponsors as a menu of options or a toolbox of sustainability strategies. Please also see Attachment 1, City of Irvine Comments on Draft PEIR.**

SCAG staff has stated on numerous occasions at the OCCOG Board of Directors meeting and at the RTP 2012 Workshops that it was their intent to have the mitigation measures serve as a tool box or menu of options that could be used by local jurisdictions, local agencies, and project sponsors. However, inclusion of these strategies as mitigation measures in the PEIR negates the ability of the local jurisdictions, local agencies, and project sponsors to use the strategies in that manner. The PEIR should contain only those mitigation measures SCAG has the purview to implement and monitor.

- **SCAG should remove all mitigation measures that are duplicative of existing regulations administered by or under the jurisdiction of other agencies. For each impact, SCAG could add the language "Local jurisdictions, agencies, and project sponsors should comply, as applicable, with existing federal, state, and local laws and regulations." Please also see Attachment 1, City of Irvine Comments on Draft PEIR.**

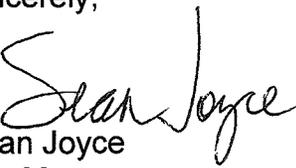
Many of the mitigation measures in the PEIR are duplicative of existing regulation or processes. Under the California Environmental Quality Act (CEQA), it is intended that measures be identified that will mitigate the impacts of the projects. Existing regulations are assumed to be abided by in the evaluation of the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between stated mitigation and the regulation.

- **The Draft 2012 RTP/SCS and PEIR indicate SCAG has determined the strategies and mitigation measures to be feasible. Where SCAG deems a mitigation measure is feasible, SCAG shall provide documentation of this feasibility. Please also see Attachment 1, City of Irvine Comments on Draft PEIR.**

SCAG staff has not identified any analysis that supports the feasibility of the mitigation measures in the PEIR and the strategies in the Draft 2012 RTP/SCS that are to be undertaken by entities other than SCAG.

The City of Irvine appreciates your consideration of all the comments provided in this letter and its attachments and looks forward to your responses. It is a shared goal to have a Regional Transportation Plan and Sustainable Communities Strategy adopted on April 4, 2012 that represents the best in regional planning developed collaboratively with local jurisdictions and stakeholders in a manner that is credible and defensible on all levels. If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Sean Joyce  
City Manager

Attachments:

1. City of Irvine Comments on Draft PEIR
2. OCCOG Technical Comment List

cc: City Council  
Sharon Landers, Assistant City Manager  
Eric Tolles, Director of Community Development  
Manuel Gomez, Director of Public Works  
Eric Tolles, Director of Community Development  
Barry Curtis, Manager of Planning Services  
Katie Berg-Curtis, Project Development Administrator  
Marika Modugno, Senior Planner  
Dave Simpson, OCCOG  
Jacob Lieb, SCAG

## **Attachment 1: City of Irvine Comments on the PEIR**

### **I. INTRODUCTORY COMMENTS**

This document provides comments, on behalf of the City of Irvine (“Irvine”), on the Draft Program Environmental Impact Report (“PEIR”) prepared by the Southern California Association of Governments (“SCAG”) for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (“2012-2035 RTP/SCS” and/or “Plan”). As explained below, the PEIR can and should be revised and clarified, so that it can (i) comply with the requirements of the California Environmental Quality Act (“CEQA”) (Pub. Resources Code, § 21000, *et seq.*) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Ch. 3, § 15000, *et seq.*), and (ii) prove a useful tool in connection with the evaluation of future local and regional projects.

#### ***1. Useability of PEIR in Connection With Later Environmental Analyses***

Irvine’s most pressing concern with the PEIR is that the environmental document will create unnecessary confusion as to the content and requirements of future local level environmental analyses. The PEIR is replete with mitigation measures that SCAG claims “can and should” be implemented by local agencies. And, even with the implementation of those measures assumed, the PEIR concludes that “significant and unavoidable” impacts will exist on almost every environmental dimension.

That approach threatens to unnecessarily complicate future environmental analyses for local agencies, including Irvine. What if measures that are deemed “feasible” by SCAG at a program level prove infeasible at a project level? Even if those measures are implemented at a project level, will the local agency have to repeat SCAG’s finding that impacts nevertheless remain significant and unavoidable? Even though SCAG’s RTP/SCS may not be consistent with local jurisdictions’ general plans and/or cumulative growth assumptions, will local agencies (at least for regionally significant projects have to annex the PEIR’s forecast of near-universal “significant and unavoidable” impacts into the cumulative impact analyses of project-level EIRs? If so, will that require repeated local-agency statements of overriding considerations?

To assist local agencies that will have to wrestle with these issues, we suggest that the PEIR acknowledge in the Executive Summary section that while it “includes mitigation measures designed to help avoid or minimize significant environmental impacts,” those measures were selected without the ability to evaluate each project that could occur as a result of the Plan. Further, the PEIR should note that many impacts were noted as “significant and unavoidable” *even though* they could be mitigated to “less than significant at the project-level,” once such a project-level analysis is done. Finally, and consistent with the foregoing, the PEIR should acknowledge (as it does in Chapter 3) that “[p]roject specific environmental documents may adjust [the mitigation measures listed] as necessary to respond to site-specific conditions.” (*See, e.g.,* Page 3.2-35, Page 3.3-45, Page 3.4-22, Page 3.12-30.)

#### ***2. Mitigation Measures***

The PEIR's approach to mitigation suffers from a series of recurring flaws. First, the PEIR relies upon dozens of mitigation measures that the PEIR claims "can and should be implemented" by local jurisdictions or project sponsors. Unfortunately, for most of those mitigation measures, there is little if any data concerning the actual feasibility of implementation. Thus, the notion that measures either "can" or "should" be implemented is not supported by evidence in the record. That lack of information is important because CEQA only allows the imposition of "feasible" mitigation; if a measure is infeasible, then CEQA requires either (i) an identification of an alternative measure that *is* feasible, or (ii) the acknowledgment that the "post-mitigation" environmental impact will be more significant than if the (infeasible) mitigation were implemented.

Second, in most chapters, there is no clear means of gauging the effectiveness of the proposed mitigation measures. Most of the environmental analyses of anticipated "with project, without mitigation" conditions are so general that one cannot tell the severity of an identified impact with any certainty. Absent that information, it is difficult to discern whether and to what extent a mitigation measure would, if feasible and implemented, reduce the forecasted impacts. Consistent with this observation, most sections of the PEIR do not include any clear explanation of how and to what extent identified mitigation measures reduce impacts that would occur but for the imposition of mitigation.

Third, in almost every case, the mitigation measures do not provide specific, articulable standards by which their efficacy may be determined. That approach results in measures that have uncertain application, and even more uncertain effectiveness. As one court put it, "[i]f, as so many courts have said, the EIR is the heart of CEQA, then to continue the anatomical metaphor, mitigation is the teeth of the EIR." (*Envtl. Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039.) To have legally sufficient "teeth," mitigation measures must have definitive performance standards. (*Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 794; *Gray v. County of Madera* (2007) 167 Cal.App.4th 1099, 1119, 1126.)

Fourth, the PEIR appears to confuse "existing regulations" with mitigation measures. Many existing regulatory requirements are characterized as "mitigation" even though those requirements would have to be honored with or without the approval of the PEIR. Proceeding in that manner tends to overstate impacts in the "with project, without mitigation" scenarios. Put another way, assuming compliance with existing regulations in the "with project, without mitigation" scenarios provides a more accurate forecast of the project's baseline impacts.

Fifth, the PEIR also appears to confuse "the project" with its mitigation measures. Indeed, many of the "mitigation measures" are framed as policy statements to be performed in the implementation of the project. As such, those actions should be re-framed and assumed as "part of the project" rather than mitigation for the project.

Sixth, the PEIR's reliance on measures that "can and should" be implemented by local jurisdictions has an unclear application. It appears that even though SCAG cannot ensure implementation of such measures, it nevertheless *assumes* that those measures will be implemented in the environmental analysis. A superior approach, used by many jurisdictions, is to identify measures that "can and should" be implemented by other jurisdictions, then adopt a

Statement of Overriding Considerations for the corresponding impact; thereby recognizing that the certifying agency (SCAG) has no power to compel implementation of the identified mitigation. While the PEIR ultimately finds almost every studied impact to be “significant and unavoidable” those determinations are made assuming that those measures that “can and should” be implemented will in fact be implemented.

All of the foregoing issues contribute to an overriding concern for Irvine: Once the PEIR is certified, it will be difficult (if not impossible) to either rely on the analysis in the PEIR or to prepare a tiered environmental document from the PEIR. The detail and structure of the environmental analysis is too general; the relationship between mitigation measures, existing regulations, and project components is too unclear; and the standards by which mitigation efficacy is to be judged are too vague to meaningfully build upon the first level, programmatic, discussion in the PEIR.

More detail on our concerns with the mitigation measures in the PEIR is provided in Attachment A.

## II. CHAPTER-SPECIFIC PEIR COMMENTS

### 1. Section 1.0 Introduction

**Item 1:** At Page 1-1, second full paragraph of the Summary Section, the PEIR states that “Individual transportation projects are preliminarily identified in the 2012-2035 RTP/SCS; however, this PEIR analyzes potential environmental impacts from a regional perspective and is programmatic in nature. As such, it does not specifically analyze these individual projects,” choosing instead to defer that analysis to a later time, stating: “Project-specific analysis will be undertaken by the appropriate implementing agency prior to individual projects being considered for adoption.” Thus, the PEIR recognizes that individual transportation projects will require project-specific analysis. That recognition conflicts, however, with Page 1-7, at Transportation Project Mitigation, where the PEIR states, (emphasis added), “*This Draft PEIR has made a preliminary determination that the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them.*” Please modify the PEIR to clarify that statements concerning the feasibility and effectiveness of mitigation are based on programmatic assumptions, not project-specific determinations, and that the ultimate determination of project level feasibility lies with local agencies.

### 2. Section 3.1 Aesthetics

**Item 1:** The mitigation measures listed in the Aesthetics and Views Impact section do not provide specific articulable standards by which their efficacy may be judged. Measures MM-AV1 through MM-AV12 provide guidelines and platitudes, but no measure of effectiveness. As an example, MM-AV8 states in general: “Project sponsors can and should design projects to minimize contrasts in scale and massing between the project and surrounding natural forms of development.” This measure is posed as “mitigation” for the following impact: “Potential to create significant contrasts with the overall visual character of the existing landscape setting or add urban visual elements to an existing natural, rural, and open space area.” As is apparent, the “mitigation measure” is functionally just a restatement of the “impact”; it has no “bite” in reality.

While the Plan is a programmatic one, and aims to address impacts at the program level, such that Mitigation Measures were not as detailed as if at the project level, the measures must still have a standard by which to determine efficacy so as to distinguish them from a mere suggestion (or restatement of the “impact” that they seek to mitigate).

Additionally, each of the impacts to Aesthetics listed in Section 3.1, assume performance of the mitigation, and even in such performance, concludes the impact is “significant and unavoidable.” Unlike subsequent sections, this Section, in listing out its Mitigation Measures at Page 3.1-15, *does not note* that such Mitigation Measures can be modified or adjusted as necessary to respond to project-specific conditions. This conflicts with the PEIR’s stated recognition of the need for project-specific analysis, and that “significant and unavoidable” conclusions as to Impact mitigation was determined due to the programmatic nature of the PEIR, and can change at the project-specific level. Please explain the differential treatment of impacts in this section.

### ***3. Section 3.2 Air Quality***

**Item 1:** In analyzing Impact 3.2-1, the PEIR states: “Mobile source emissions of ROG, NO<sub>x</sub>, CO, PM 10, PM 2.5, and SO<sub>x</sub> would stay approximately the same or decrease (often substantially) when compared to existing conditions. This is considered to be a beneficial impact. Re-entrained roadway dust would increase proportionate to VMT. This would be a significant impact.” The PEIR further states that roadway construction activity would contribute to regional dust levels, and “re-entrained roadway dust” would be expected to increase under the Plan as compared to existing conditions. The PEIR also states that “[t]hese construction emissions, although unavoidable, would be partially controlled by air districts fugitive dust rules.” The applicable “fugitive dust rules” are not clearly identified and explained in the PEIR. Please clarify and provide examples of such “fugitive dust rules,” and explain how those rules would effectively deal with increased regional dust.

**Item 2:** At page 3.2-30, the PEIR states there is the “[p]otential to increase population within 500 feet of transportation facilities that could expose residents (schools and other sensitive receptors) to elevated (as compared to average) cancer and other health risks.” The PEIR then recommends mitigation measure MM-AQ19 to reduce this impact to a less-than-significant level. MM-AQ19 requires compliance with the California Air Resources Board Air Quality and Land Use Handbook (June 2005) to achieve an acceptable interior air quality level for sensitive receptors. MM-AQ19 further suggests that project sponsors “can and should” incorporate “appropriate measures” into project building design.

This mitigation measure elevates the voluntary guidance from the California Air Resources Board Air Quality and Land Use Handbook to mandatory compliance on the part of project sponsors. Please explain and justify that approach. Furthermore, please explain how such compliance would achieve “acceptable interior air quality level for sensitive receptors.”

**Item 3:** At page 3.2-32, the PEIR states “[m]itigation measures to reduce air quality impacts would be established in project-specific environmental documents,” and that such impacts should be addressed at the project level analysis. Following that, the PEIR states that the overall impact of the 2012-2035 RTP/SCS Plan would create substantial emissions and that “Implementation of Mitigation Measures MM-AQ1 through MM-AQ18 would reduce criteria pollutant impacts;

however, impacts would remain significant.” There is potentially a conflict between conducting project-specific environmental analysis and further having to implement MM-AQ1 through MM-AQ18 to reduce criteria pollutant impacts. This can likely be clarified by noting that the mitigation measures are subject to project-specific feasibility and effectiveness determinations by the project sponsor or agency with jurisdiction over the project, and that such project sponsor or agency has the authority to implement such measures as appropriate given project-specific analysis that is undertaken.

**Item 4:** At page 3.2-39 the PEIR states that “[t]ables 3.2-4 and 3.2-5 show the residential and workplace cancer risk, respectively.” This should be changed to Tables 3.2-7 and 3.2-8.”

Further, in the same paragraph, the PEIR states “[i]t is estimated that the Plan would result in 293,633 annual health incidences leading to \$4,952,996,222 spent on healthcare. This is a 24 percent reduction when compared to the No Project Alternative.” Please explain where the number of annual health incidences is derived and the associated costs as the tables do not indicate these numerical values, both in the amount spent in healthcare costs and the percentage decrease.

#### ***4. Section 3.3 Biological Resources & Open Space***

**Item 1:** At page 3.3-45 the PEIR states that Mitigation Measures BIO/OS46 through BIO/OS49 and BIO/OS54 “would reduce open space/rangelands impacts.” Please discuss how the concept of “induced growth” under MM-BIO/OS47 does not conflict with Measure M2.

**Item 2:** At page 3.3-45, “Cumulative Impacts 3.3-10” is noted as the “[p]otential to contribute to a cumulatively considerable loss of habitat and biological resources.” The PEIR further states that implementation of Mitigation Measures BIO/OS1 through BIO/OS59 would reduce cumulative impacts; however, impacts would remain significant.” As to MM-BIO/O55, the mitigation measure states that local agencies “can and should” establish *programs and funding mechanisms* to create protected conservation areas. This Mitigation Measure should include a standard to determine how effective imposition of additional taxes and fees in creating programs and funding to create conservation plans would reduce the negative impact or loss of habitat and biological resources.

#### ***5. Section 3.4 Cultural Resources***

**Item 1:** Beginning at Page 3.4-22, MM-CUL1 and MM-CUL2 indicate that “the appropriate Information Center” should be contacted to determine whether a project-area has been previously surveyed and whether historic resources are identified, and if indicated as such, then a “qualified architectural historian” should be obtained by the project sponsors to “conduct historic architectural surveys as recommended by the Information Center.” And that further, the “Information Center,” in the event that no survey has been conducted, “will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project.” Additionally, MM-CUL7, also references an “Information Center” that should be consulted to conduct proper surveys. Please clarify which “Information Center” MM-CUL1, MM-CUL2, and MM-CUL7 is referring to. For

example, MM-CUL6 notes it is the “Information Center of the California Archaeological Inventory” to be consulted to conduct the appropriate surveys.

## 6. Section 3.5 Geology, Soils & Mineral Resources

**Item 1:** At Page 3.5-23 the PEIR states that a “greater amount of transportation projects in the Plan would increase the amount of transportation infrastructure that would be subject to risk as a result of surface rupture, ground-shaking liquefaction, and landsliding and other risks associated with seismic events.” Additionally, the “No Project Alternative would result in the construction of approximately 68,040 new lane miles compared with over 74,297 new lane miles in the 2012-2035 RTP/SCS,” thereby drawing the conclusion that “Impacts related to geologic and seismic resources would be similar to the Plan under the No Project Alternative because the population would be the same and the entire region is subject to seismic risk.”

This conclusion seems questionable if under the Plan, a greater number of transportation projects would be built, resulting in the 74,297 new lane miles, that would be subject to risk associated with seismic events. The conclusion appears to be drawn because the total population will be the same under both the No Project and the Plan, and that the region as a whole would be subject to seismic risk—however, the increase in transportation infrastructure and projects itself is at risk due to seismic events, and the increase of such infrastructure in comparison to a No Project scenario, would seem to conclude that there be a greater impact under the Plan than under the No Project alternative. Because there would be the same population increase and the region would be subject to seismic risk, does not preclude greater impacts under the Plan due to increases in transportation infrastructure.

## 7. Section 3.6 Greenhouse Gas Emissions

**Item 1:** At page 3.6-6 the paragraph on Assembly Bill 811 appears to be incomplete.

**Item 2:** Page 3.6-15, last paragraph on the page explains that Table 3.6-3 shows Greenhouse Gas Emissions by County. Second sentence states “Baseline (2005) emissions are estimated to be 142 million metric tons (MMT) of CO<sub>2e</sub> compared to an estimated 144 MMT of CO<sub>2e</sub> under existing (2011) conditions.” According to Table 3.6-3, the total estimate for Baseline (2005) CO<sub>2e</sub> emissions in MMT is 132, and the estimate for Existing (2011) CO<sub>2e</sub> emissions in MMT is 130. Please explain the calculation reflected on Page 3.6-15 as opposed to the table numbers on Page 3.6-16.

## 8. Section 3.7 Hazardous Materials

**Item 1:** At pages 3.7-9 through 3.7-11, Impact 3.7-1 is discussed, which is the “Potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.” Within the discussion of Impact 3.7-1, on Page 3.7-10, first full paragraph, the PEIR states (emphasis added) “*In general*, it is anticipated that the increase in transport of hazardous materials would result in a *less-than-significant hazard* to the public and/or the environment, because handling and transport of hazardous materials and wastes are subject to numerous laws, regulations, and health and safety standards set forth by federal, State, and local authorities that regulate the proper handling of such materials and their containers.” Further on Page 3.7-10, the PEIR notes that the “2012-2035 RTP/SCS directs growth adjacent to transit and transportation facilities, and with this increased growth, there would be greater potential for exposure of sensitive receptors as well as other uses to risks associated with

hazardous material transport” and that such a greater potential impact “would be analyzed on a case-by-case basis.” Finally, on Page 3.7-11, the section concludes that “[a]lthough individual projects would be required to comply with all existing regulations, due to the volume of projects (transportation and development) contained within the RTP/SCS, *it is possible that significant impacts could occur*. Therefore, without Mitigation Measures MM-HM1 through MM-HM3, *impacts could be significant*.”

Based on the above, the PEIR notes “in general” the increase in transport of hazardous materials is anticipated to result in a less-than-significant hazard, but that projects would have to be analyzed on a case-by-case basis, such that it is “possible” significant impacts could occur, and that without MM-HM1 through MM-HM3, impact could be significant. There does not appear to be a conclusion, however, that Impact 3.7-1 would be “significant and unavoidable,” even with the undertaking of the mitigation measures. This is somewhat conflicting, given the general notion that it is anticipated the increase in transport of hazardous materials would result in less-than-significant hazard to the public and/or environment. This is further in conflict with the Executive Summary table, in which Impact 3.7-1 is listed on Page ES-33 as being “significant and unavoidable” after mitigation despite the statement at Page 3.7-11, that impacts “could” be significant, rather than “impacts would remain significant.”

**Item 2:** Page 3.7-13, MM-HM1 and MM-HM2 both state that “SCAG shall encourage” the United States Department of Transportation, the Office of Emergency Service, the California Department of Transportation, and the California Highway Patrol to continue to take certain actions, such as conducting driver safety or enforcing speed limits.” These mitigation measures only seek to “encourage” other departments to continue carrying out regulations currently enforced, and provides no determination of how to determine if such measures serve to mitigate Impact 3.7-1 and Impact 3.7-4, for which it is listed, and its effectiveness as a mitigation measure.

### **9. Section 3.8 Land Use & Agricultural Resources**

**Item 1:** Page 3.8-12 to 3.8-13, the PEIR recognizes that despite attempts to work with local jurisdictions, including, counties, subregions and local city planners, it is likely that the 2012-2035 RTP/SCS has relied on general plans that are not current and the implementation of RTP/SCS transportation projects and resulting growth will be inconsistent with general plans, and therefore the RTP/SCS includes the “policy to continue public outreach efforts and incorporate local input” to develop a more accurate forecast in future RTP/SCSs.

The PEIR subsequently notes that SCAG “has no authority to adopt local land use plans or approve local land use projects that will implement the SCS” because “SB 375 specifically provides that nothing in the law supersedes the land use authority of cities and counties. In addition, cities and counties are not required to change their land use plans and policies, including general plans, to be consistent with an RTP/SCS. However, local jurisdictions are encourage by SCAG to consider the [methods discussed in Chapter 4 and Chapter 2].” In other words, SCAG encourages local jurisdictions to adopt and update general plans that are consistent with the 2012-2035 RTP/SCS in order to accomplish the goals of SB 375. To this end, implementation of Mitigation Measures MM-LU1 through MM-LU10 would reduce impacts

related to potential conflicts with an applicable land use plan, policy, or regulation of any agency with jurisdiction over the project; however, impacts would remain significant.

There appears to be an inconsistency with this recognition on Pages 3.8-12 to 3.8-13 that SCAG can only *encourage* local jurisdictions to adopt plans that would reduce the impact of inconsistent local land use plans and policies with the RTP/SCS, consistent with SB 375's protection of ultimate land use authority of cities and counties, with the actual Mitigation Measures listed, namely MM-LU3, MM-LU8, and MM-LU10.

- a. MM-LU3 states "SCAG shall work with its member cities and counties to ensure that transportation projects and growth are consistent with the RTP and general plans." This mitigation measure seems to require that the project sponsors in fact comply with the RTP, when such projects and growth falls within the protection of SB 375 and is a local land use control issue, within the local jurisdiction's purview.
- b. MM-LU8 states "SCAG shall use its Intergovernmental Review Process to provide review and comment on large development projects regarding their consistency with the RTP and other regional planning efforts." This proposed mitigation measure seems inconsistent with SB 375 and SCAG's role to encourage consistency.
- c. MM-LU10 states "Local jurisdictions can and should provide for new housing consistent with the Regional Housing Needs Assessment (RHNA) to accommodate their share of the forecasted regional growth." This proposed mitigation measure is problematic because local jurisdictions are not required to provide housing, and thus such measure conflicts with local authority. This may be remedied by revising the language of MM-LU10 to reflect compliance with state law with regard to housing to accommodate forecasted regional growth.

**Item 2:** At page 3.8-15, the PEIR states that "substantial disturbance and/or loss of forestlands, prime farmlands and/or grazing lands, throughout the six-county SCAG region" is mitigated by MM-LU15, which states "Project sponsors can and 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 transportation projects/improvements." This proposed mitigation, however, could constitute a "taking" of property and mitigates for "induced growth." Furthermore, MM-LU16 through MM-LU35, suggested to mitigate Impact 3.8-3, are insufficient in that they state local jurisdictions or project sponsors "can and should" take on various measures without noting how such measures will be evaluated for effectiveness in mitigating Impact 3.8-3. For example, MM-LU26, states "Project sponsors and local jurisdictions can and should promote infill development and redevelopment to encourage the efficient use of land and minimize the development of agricultural and open space lands" is again seemingly not a measure that can be meaningfully evaluated and/or quantified in determining efficacy.

**Item 3:** At Pages 3.8-15 through 3.8-16, the PEIR discusses the "[p]otential to influence the pattern of urbanization in the region such that land use incompatibilities could occur," and MM-LU36 through MM-LU85 are recommended to reduce land use impacts and again are insufficient insofar as they claim that local jurisdictions "can and should" take on various measures without noting how such measures will be evaluated for effectiveness in mitigating

Impact 3.8-3. For example, MM-LU44 states “The improvement and expansion of one urban public facility or service can and should not stimulate development that significantly precedes the local jurisdiction’s ability to provide all other necessary urban public facilities and services at adequate levels.” It is unclear how to determine when one urban public facility or service will cause a significant impact on a local jurisdiction’s ability to provide all other necessary urban public facilities and services at “adequate levels,” given that such “adequate levels” are not identified.

**Item 4:** Page 3.8-21, MM-LU53 states “SCAG shall promote infill, mixed-use, and higher density development, and provide incentives to support the creation of affordable housing in mixed use zone.” Please describe how SCAG will seek to provide such incentives to support the creation of affordable housing in mixed use zones.

**Item 5:** Page 3.8-23, MM-LU69 states “Local jurisdictions can and should promote greater linkage between land uses and transit, as well as other modes of transportation.” This Mitigation Measures is vague in that it does not provide what “greater linkage” measures would include, and how its effectiveness to minimize the impact of incompatible land uses would be determined.

**Item 6:** Page 3.8-25, MM-LU84 states “Local jurisdictions can and should give preference for infrastructure improvements that support or enhance desired land uses and projects.” It is unclear what are the “desired land uses and projects” in MM-LU84, and how local jurisdictions are to give preference to such infrastructure improvement such as how it should be determined that such improvements actually enhance a desired land use and project, to be implemented by a local jurisdiction, and what measures of effectiveness should be applied.

**Item 7:** Page 3.8-25, MM-LU85 states “Local jurisdictions can and should reduce heat gain from pavement and other hardscaping, including . . . Reduce street rights-of-way and pavement widths to pre-World War II widths (typically 22 to 34 feet for local streets, and 30 to 35 feet for collector streets, curb to curb), unless landscape medians or parkway strips are allowed in the center of roadways.” Please explain how reducing streets to pre-World War II widths will not conflict with local fire department required street access. Further, please explain how to measure the effectiveness of MM-LU85 in reducing Impact 3.8-4.

### ***10. Section 3.11 Public Services and Utilities***

**Item 1:** At page 3.11-6, the PEIR indicates that the Plan has the potential to increase exposure to wildfires and hazards due to new or expanded infrastructure. Additionally, at Page 3.11-9, in the PEIR’s analysis of Direct Impacts, in comparing the Plan with the No Project Alternative, the PEIR notes that “under the No Project Alternative, it is anticipated that 83,990 households would be exposed to extreme wildfire threats; whereas under the 2012-2035 RTP/SCS, the number would be reduced to 71,553. This would be a 14 percent decrease in households exposed to extreme wildfire threats, as measures to reduce wildfire threats are implemented with planned 2012-2035 RTP/SCS projects.” The PEIR notes what the expected number of households exposed to wildfire threats would be in 2035 under a No Project scenario, and notes the decrease by 14 percent in relation to the number of households exposed under the Plan, however the PEIR

does not note the current number of households exposed, to reflect a corresponding potential increase under the Plan.

**Item 2:** At page 3.11-47, just above Table 3.11-11, the PEIR states that the Table reflects that “urban development and growth that would be accommodated by the transportation investments in the 2012-2035 RTP/SCS would result in less overall use of energy resources in 2035 than in 2011.” The total use of electricity and natural gas consumption as reflected in Table 3.11-11 is *actually higher* compared from 2035 under the Plan to the current 2011 energy consumption. What the Table reflects is a less overall use of energy resources in 2035 as between a No Project scenario and the Plan scenario. Thus, the statement that the “urban development and growth that would be accommodated by the transportation investments in the 2012-2035 RTP/SCS would result in less overall use of energy resources in 2035 than in 2011” should be amended accordingly.

**Item 3:** At page 3.11-49, MM-PS64 states “[s]tate and federal lawmakers and regulatory agencies can and should pursue the design of programs to either require or incentivize the expanded availability including the expansion of alternative fuel filling stations and use of alternative-fuel vehicles to reduce the impact of shifts in petroleum fuel supply and price.” This mitigation is assigned to State and Federal agencies and lawmakers, who are outside of SCAG’s purview.

**Item 4:** At pages 3.11-51 through 3.11-52, MM-PS91 and MM-PS92 require local jurisdictions to take on mitigation measures that will likely directly increase the cost of housing, but do not include measures by which to determine the effectiveness of requiring energy audits in achieving mitigation of Impact 3.11-11.

**Item 5:** At page 3.11-53, mitigation measure MM-PS106 states “[l]ocal jurisdictions can and should provide, where feasible, creative financing for renewable energy projects, including subsidized or other low-interest loans, and the option to pay for system installation through long-term assessments on individual property tax bills.” This mitigation measure is currently a voluntary program, and should be made clear that it will remain voluntary for local jurisdictions, to determine when such programs are “feasible” in accordance with the project-specific analysis that will be conducted at the project level.

### ***11. Section 3.12 Transportation, Traffic, and Security***

**Item 1:** MM-TR1 serves as an example of a mitigation measure that provides no articulable standard by which to determine its efficacy. MM-TR1 states, “SCAG shall establish a forum where policy-makers can be educated and can develop consensus on regional transportation safety and security policies.” It is unclear how exactly such requirement shall be measured for effectiveness and how such measure will mitigate the impacts discussed in Section 3.12.

**Item 2:** At page 3.12-33, MM-TR26 and MM-TR27 both note that “SCAG shall encourage local agencies to fully implement these policies and projects.” It appears that both mitigation measures are more of a suggestion that local agencies fully implement the measures included in the Plan, but has no measure of effectiveness if such measures are adopted or that such measures must be implemented.

**Item 3:** At page 3.12-36, MM-TR34 states “[l]ocal jurisdictions can and should meet an identified transportation-related benchmark.” Please explain what would be an “identified transportation-related benchmark” and who would determine such benchmark, and the standards by which the effectiveness of meeting such a benchmark would achieve in mitigating Impact 3.12-1.

**Item 4:** At page 3.12-36, MM-TR37 states “[l]ocal jurisdictions and transit agencies can and should provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers.” Please describe or explain how the subsidies are to be provided for by local jurisdictions and transit agencies in accordance with this proposed mitigation measure.

**Item 5:** At page 3.12-37, MM-TR52 states “[l]ocal jurisdictions can and should reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.” Please describe or explain how local jurisdictions are to determine these “new development standards” and how the effectiveness of such standards will be measured to determine effectiveness of such a mitigation measure.

**Item 6:** At page 3.12-37, MM-TR56 deals with System Interconnectivity, stating that “Local jurisdictions can and should create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following . . .” which includes (i) “study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less, dense underutilized areas to do so” and (ii) “use park-and-ride facilities to access transit stations only at ends of regional transitways or where adequate feeder bus service is not feasible.” Please explain how this measure was determined, that free transit be provided to areas with residential densities of 15 dwelling units per acre or more.

**Item 7:** At page 3.12-38, MM-TR59 states that local jurisdictions “can and should prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation” and sets forth two methods to do so, including “Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic” and “before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.” Please explain how this mitigation measure does not conflict with all local transportation measures already in place, including Measure M2 and Measure R in Los Angeles County.

**Item 8:** Page 3.12-40, MM-TR74: “Low- and No- Travel Employment Opportunities: Local jurisdictions can and should facilitate employment opportunities that minimize the need for private vehicle trips, including” the measure that local jurisdictions “encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.” Please describe or explain how the telecommuting networks will be implemented and whether such incentives would mean the need for new taxpayer funded subsidies.

**Item 9:** At page 3.12-43, MM-TR97 states “Travel Mitigation: Local jurisdictions can and should mitigate business-related travel, especially air travel, through the annual purchase of verified carbon offsets.” This measure requires that local jurisdictions purchase carbon offsets, without setting forth benchmarks or standards to determine the effectiveness of such a measure in reducing Impact 3.12-1 and 3.12-3.

**Item 15:** At page 3.12-43, MM-TR98 states “Transit Access to Municipal Facilities: Local jurisdiction and agency facilities can and should be located on major transit corridors, unless their use is plainly incompatible with other uses located along major transit corridors.” Please explain locating municipal facilities in a “major transit corridor” will effectively mitigate Impact 3.12-1 and 3.12-3.

**Item 16:** Page 3.12-30: Impact 3.14-6 should read Impact 3.12-6.

### *12. Section 3.13 Water Resources*

**Item 1:** At page 3.13-39, MM-WR26 imposes more regulations than the current National Pollutant Discharge Elimination System (NPDES) permit requirements, regulated by the State Water Resources Control Board as delegated by the U.S. Environmental Protection Agency, and would require mitigation on project sites smaller than one acre in size. Please explain and justify that approach.

### *13. Section 4.0 Alternatives*

**Item 1:** While an EIR need not include an in depth discussion of the alternatives that were not considered feasible, according to CEQA Guidelines, section 15126.6(c), it should briefly identify alternatives rejected as infeasible and explain why they were rejected. It does not appear that this PEIR does so.

**Item 2:** Page 4-4 lists brief descriptions of the Alternative 2 and Alternative 3 projects. Alternative 2 only describes Modified 2008 RTP Alternative as an “update of the adopted 2008 RTP to reflect the most recent growth estimates and transportation planning decisions and assumptions” and goes on to say that the alternatives “does not include urban form strategies included within the SCS, but includes all of the modifications and projects in the 2008 RTP through RTP Amendment 4. The growth scenario for the Modified 2008 RTP Alternative is a combination of local input and existing general plan and land use data provided by local jurisdictions.”

This does not include enough description of Alternative 2 to verify that the conclusions made as to the comparative effects of that Alternative for each of the Impacts discussed in turn from Pages 4-22 through 4-30. The analysis of each Impact under the Modified 2008 RTP Alternative as compared to the Plan explains the difference in Impact, but without explanation of how such a conclusion were formulated/achieved.

For example, under Hazardous Materials at Page 4-27, it states “The Modified 2008 RTP Alternative would have similar impacts related to the accidental release of hazardous materials as compared to the Plan.” The reasoning behind that conclusion should be provided, and would be

supported by a more thorough description of what the Modified 2008 RTP Alternative plan would entail.

#### *14. Section 5.0 Long Term Effects*

**Item 1:** Page 5-3, the PEIR states “Resources that would be permanently and continually consumed by the proposed project’s implementation include water, electricity, natural gas, fossil fuels, and aggregate resources; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources.” To better understand how it was determined there would not be unnecessary, inefficient, or wasteful use of resources, resulting in irreversible, significant environmental effects, the reasoning behind such a conclusion should be provided.

### **III. Conclusion**

For all of the foregoing reasons, Irvine respectfully believes the PEIR should be revised to clarify the PEIR’s approach to mitigation, reflecting that feasibility and effectiveness of the Mitigation Measures were determined at a programmatic level, and that project-specific analysis will amend or adopt such Measures as appropriate upon further analysis, allowing for measures to be bypassed by local jurisdictions when project level analyses find the measures either infeasible or unnecessary. Additionally, the Mitigation Measures should be amended to include articulable standards by which to determine their efficacy in mitigating their corresponding Impacts recognized by the PEIR. A consensus should be reached as to how to conduct future Cumulative Impacts determinations upon local jurisdictional undertaking of project-specific analysis, given the findings of “significant and unavoidable” impacts at a programmatic, but not project-specific level.

Thank you for considering these comments.

**ATTACHMENT A**

**MATRIX OF CONCERNS WITH RTP/SCS PEIR MITIGATION MEASURES**

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
<b>AESTHETIC RESOURCES</b>					
AV1					X
AV2					X
AV3			X		X
AV4	X		X		X
AV5		X			X
AV6	X	X			X
AV7	X		X		X
AV8		X			X
AV9		X			X
AV10					X
AV11		X			X
AV12					X
<b>AIR QUALITY</b>					
AQ1		X	X		X
AQ2		X	X		X
AQ3			X		X
AQ4					X
AQ5					X
AQ6		X			X

ATTACHMENT A: MATRIX OF CONCERNS WITH MITIGATION MEASURES

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
AQ7			X		X
AQ8			X		X
AQ9			X		X
AQ10			X		X
AQ11					X
AQ12					X
AQ13					X
AQ14		X			X
AQ15		X	X		X
AQ16					X
AQ17			X		X
AQ18					X
AQ19			X	X	X
AQ20					X
BIOLOGICAL RESOURCES AND OPEN SPACE					
BIO/OS1			X		X
BIO/OS2					X
BIO/OS3					X
BIO/OS4					X
BIO/OS5					X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
BIO/OS6					X
BIO/OS7					X
BIO/OS8					X
BIO/OS9					X
BIO/OS10					X
BIO/OS11					X
BIO/OS12					X
BIO/OS13					X
BIO/OS14					X
BIO/OS15			X		X
BIO/OS16					X
BIO/OS17					X
BIO/OS18		X			X
BIO/OS19			X		X
BIO/OS20			X		X
BIO/OS21			X		X
BIO/OS22			X		X
BIO/OS23			X		X
BIO/OS24			X		X
BIO/OS25			X		X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
BIO/OS26			X		X
BIO/OS27			X		X
BIO/OS28			X		X
BIO/OS29			X		X
BIO/OS30			X		X
BIO/OS31			X		X
BIO/OS32			X		X
BIO/OS33			X		X
BIO/OS34			X		X
BIO/OS35			X		X
BIO/OS36	X	X			X
BIO/OS37	X	X			X
BIO/OS38	X	X			X
BIO/OS39					X
BIO/OS40					X
BIO/OS41					X
BIO/OS42	X				X
BIO/OS43	X	X	X		X
BIO/OS44		X			
BIO/OS45	X	X			X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
BIO/OS46	X	X			
BIO/OS47	X	X			X
BIO/OS48	X	X			X
BIO/OS49			X		X
BIO/OS50					X
BIO/OS51		X			
BIO/OS52					X
BIO/OS53		X			X
BIO/OS54	X	X			X
BIO/OS55	X	X			X
BIO/OS56	X	X			X
BIO/OS57	X	X			X
BIO/OS58		X			X
BIO/OS59		X			X
CULTURAL RESOURCES					
CUL1		X			X
CUL2					X
CUL3			X		X
CUL4					X
CUL5			X		X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
CUL6					X
CUL7					X
CUL8					X
CUL9	X				X
CUL10			X		X
CUL11					X
CUL12					X
CUL13					X
CUL14	X				X
CUL15			X		X
CUL16			X		X
CUL17		X			X
GEOLOGY AND SOILS					
GEO1			X		X
GEO2			X		X
GEO3					X
GEO4					X
GEO5					X
GEO6					X
GEO7					X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
GEO8					X
GEO9					X
GEO10		X			
GEO11					
GEO12					X
GREENHOUSE GAS EMISSIONS					
GHG1		X			
GHG2		X			
GHG3		X			
GHG4		X			
GHG5		X			
GHG6		X			
GHG7		X			
GHG8		X			
GHG9		X	X		X
GHG10					X
GHG11		X			X
GHG12					X
GHG13		X			X
GHG14		X			X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
GHG15		X			X
HAZARDOUS MATERIALS					
HM1	X	X			
HM2	X	X			
HM3			X		X
HM4			X		X
HM5					X
HM6					X
HM7					X
HM8			X		X
HM9					X
HM10	X				X
HM11			X		X
HM12					X
HM13					X
HM14					X
HM15			X		X
HM16			X		X
LAND USE					
LU1		X		X	

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
LU2		X		X	
LU3		X		X	
LU4		X		X	
LU5		X		X	
LU6		X		X	
LU7		X		X	
LU8		X		X	
LU9		X		X	
LU10			X		X
LU11		X			X
LU12		X			X
LU13		X			X
LU14			X		X
LU15	X	X			X
LU16	X	X			X
LU17					X
LU18	X	X			X
LU19	X	X			X
LU20		X		X	
LU21				X	

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
LU22				X	X
LU23		X		X	X
LU24		X		X	X
LU25				X	X
LU26				X	X
LU27				X	X
LU28				X	X
LU29					X
LU30			X		X
LU31					
LU32				X	
LU33		X			X
LU34		X			
LU35		X			
LU36					X
LU37		X		X	
LU38	X	X		X	X
LU39	X	X		X	X
LU40	X	X		X	X
LU41	X	X		X	X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
LU42	X	X	X	X	X
LU43	X	X			X
LU44	X	X			X
LU45	X	X			X
LU46	X	X			X
LU47	X	X			X
LU48	X	X			X
LU49	X	X			X
LU50	X	X			X
LU51	X	X			X
LU52	X	X			X
LU53	X	X			
LU54	X	X			X
LU55	X	X			X
LU56	X	X			X
LU57	X	X			X
LU58	X	X			X
LU59	X	X			X
LU60	X	X			X
LU61	X	X			X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
LU62	X	X			X
LU63	X	X			X
LU64	X	X			X
LU65	X	X			X
LU66	X	X			X
LU67	X	X			X
LU68	X	X			X
LU69	X	X			X
LU70	X	X			X
LU71	X	X			X
LU72	X	X			X
LU73	X	X			X
LU74	X	X			X
LU75	X	X			
LU76	X	X			X
LU77	X	X			X
LU78	X				X
LU79	X				X
LU80	X				X
LU81	X				X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
LU82	X	X			X
LU83	X	X			X
LU84	X	X			X
LU85	X				X
NOISE					
NO1		X			X
NO2		X			X
NO3	X	X			X
NO4					X
NO5					X
NO6					X
NO7					X
NO8			X		X
NO9		X			X
NO10		X	X		X
NO11	X	X			X
NO12	X	X			X
NO13	X				X
NO14	X				X
NO15	X				X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
NO16	X				X
NO17	X	X			X
NO18	X				X
POPULATION AND HOUSING					
POP1		X			
POP2					X
POP3	X	X			X
POP4	X	X			X
POP5					
POP6					
PUBLIC SERVICES					
PS1			X	X	X
PS2				X	X
PS3				X	X
PS4		X		X	X
PS5		X		X	X
PS6					X
PS7				X	X
PS8				X	X
PS9				X	X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
PS10				X	X
PS11		X			X
PS12		X			X
PS13			X	X	X
PS14		X		X	X
PS15		X			X
PS16		X	X		X
PS17		X	X		X
PS18		X	X		X
PS19		X			X
PS20					X
PS21		X			X
PS22		X			X
PS23		X			X
PS24					X
PS25	X				X
PS26	X				X
PS27		X		X	
PS28		X		X	
PS29		X		X	

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
PS30		X		X	
PS31		X		X	
PS32		X		X	
PS33		X		X	
PS34		X		X	
PS35			X		X
PS36		X			X
PS37	X	X			
PS38	X	X			
PS39	X				X
PS40	X				X
PS41	X	X			X
PS42	X	X			X
PS43	X	X			X
PS44					X
PS45	X				X
PS46		X			X
PS47		X			X
PS48			X		X
PS49			X		X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
PS50					X
PS51	X				X
PS52	X	X			X
PS53	X	X			X
PS54		X			X
PS55			X		X
PS56			X	X	X
PS57				X	X
PS58			X	X	X
PS59			X	X	X
PS60		X		X	X
PS61				X	X
PS62		X		X	X
PS63	X	X		X	X
PS64	X	X		X	X
PS65	X	X		X	X
PS66	X	X		X	X
PS67	X	X		X	X
PS68	X			X	X
PS69	X			X	X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
PS70	X			X	X
PS71	X			X	X
PS72	X	X			X
PS73	X	X			X
PS74					X
PS75	X	X			X
PS76	X	X			X
PS77	X	X			X
PS78	X	X			X
PS79					X
PS80	X				X
PS81	X				X
PS82	X				X
PS83					
PS84		X			X
PS85	X				X
PS86	X				X
PS87	X				X
PS88	X				X
PS89	X				X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
PS90		X			X
PS91		X			X
PS92		X			X
PS93	X	X			X
PS94	X	X			X
PS95	X	X			X
PS96	X	X			X
PS97					X
PS98	X	X			X
PS99	X	X			X
PS100	X	X			X
PS101	X	X			X
PS102	X	X			X
PS103	X	X			X
PS104	X	X			X
PS105	X	X			X
PS106	X	X			X
PS107	X	X			X
PS108		X			X
PS109		X			X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
PS110	X	X			X
PS111					X
PS112	X	X			X
PS113	X				X
PS114		X			
PS115		X			
PS116		X			
PS117		X			
PS118		X			
PS119		X			
PS120		X			
PS121		X			
PS122		X			
PS123		X			
PS124		X			
TRANSPORTATION					
TR1		X			
TR2		X			
TR3		X			
TR4	X	X			

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
TR5		X			
TR6		X			
TR7		X			
TR8		X			
TR9		X			
TR10		X			
TR11		X			
TR12		X			
TR13					
TR14					
TR15		X			
TR16		X			
TR17		X			X
TR18					X
TR19					X
TR20	X				X
TR21		X			X
TR22		X			X
TR23	X	X			X
TR24					X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
TR25					X
TR26		X			
TR27		X			
TR28					X
TR29					X
TR30					X
TR31					X
TR32					X
TR33			X		X
TR34		X			X
TR35					X
TR36	X				X
TR37	X				X
TR38	X	X			X
TR39	X				X
TR40	X	X			X
TR41	X	X			X
TR42	X				X
TR43	X				X
TR44	X	X			X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
TR45					X
TR46					X
TR47	X				X
TR48	X				X
TR49		X			X
TR50	X				X
TR51					X
TR52					X
TR53	X				X
TR54	X				X
TR55					X
TR56	X				X
TR57	X				X
TR58					X
TR59	X				X
TR60	X				X
TR61	X				X
TR62	X				X
TR63	X				X
TR64	X				X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
TR65	X				X
TR66	X				X
TR67					X
TR68					X
TR69					X
TR70	X				X
TR71					X
TR72					X
TR73					X
TR74	X				X
TR75					X
TR76					X
TR77					X
TR78	X				X
TR79					X
TR80	X				X
TR81	X				X
TR82	X				X
TR83					X
TR84					X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
TR85	X				X
TR86					X
TR87					X
TR88					X
TR89					X
TR90					X
TR91		X			X
TR92	X				X
TR93		X			X
TR94					X
TR95					X
TR96					X
TR97	X				X
TR98	X				X
WATER					
W1	X	X			
W2	X	X			X
W3	X				X
W4		X			
W5					X

	Insufficient Analysis of Feasibility	No Articulable Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
W6	X				X
W7		X			X
W8			X		X
W9	X				X
W10			X		X
W11					X
W12			X		X
W13			X		X
W14		X			
W15			X		X
W16					X
W17			X		X
W18			X		X
W19			X		X
W20			X		X
W21	X	X			X
W22	X	X			X
W23	X				X
W24	X				X
W25					X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
W26	X				X
W27	X		X		X
W28			X		X
W29					X
W30			X		X
W31					X
W32					X
W33	X				X
W34	X				X
W35	X				X
W36	X				X
W37	X		X		X
W38		X			X
W39		X			X
W40	X				X
W41		X			
W42		X			
W43	X	X			X
W44					X
W45		X			

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
W46					X
W47					X
W48					X
W49					X
W50					X
W51					X
W52					X
W53					X
W54		X			X
W55					X
W56					X
W57					X
W58					X
W59					X
W60					X
W61					X
W62					X
W63		X			
W64					X
W65					X

	Insufficient Analysis of Feasibility	No Articulate Standard/Deferred Mitigation	Improper Integration of Regulatory Requirement	Improper Integration of Project Component	Assumption of Implementation Even though Within the Control of Another Agency
W66					X
W67		X			
W68		X			X

## **Attachment 2: OCCOG Technical Comments on the Draft 2012-2035 RTP/SCS and PEIR**

### **1. GROWTH FORECASTS**

**Issue: Growth Projections:** The 2012 growth projections identify population, housing and employment data for the six-county SCAG region, from 2008 (existing) to 2020 and 2035. These growth projections represent the best available information from local jurisdictions, the business community and landowners. However, as time passes, what is feasible for any given project can change. The triggers for change to adopted growth projections can range from factors such as market conditions, new information or data, infrastructure availability, changes in funding availability (such as the dissolution of redevelopment agencies statewide), and changes to jurisdictional boundaries resulting from future annexations and incorporations of previously-designated unincorporated territory. SCAG should continue to adopt the 2012 growth projections at a countywide level, consistent with past approvals of Regional Transportation plan growth forecasts. A county level of geography accommodates internal adjustments to changing conditions as described above, without compromising the integrity of the overall growth projections. However, approving the growth projections at any lower level of geography, such as at the city level, would be challenged with continual revisions and shifts to the total number of housing, population and employment within a city, among cities, and between cities and counties as a result of the factors described above. Adoption of the data at a level lower than the county would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the RHNA allocations must be consistent with the RTP/SCS; state law does not require that they be identical. The RTP/SCS can be adopted at the county level and the RHNA process may proceed independently until it is completed after the appeals, trades, and transfers are completed. The RHNA allocations that were derived from the growth forecast can still be determined to be consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.

**Growth Projections Recommendation:** SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, and not at a smaller level of geography such as city, census tract, or traffic analysis level.

**Issue: OCP-2010 Modified:** On January 26, 2012, the update to the OCP-2010 dataset known as "OCP-2010 Modified" was officially approved by the OCCOG Board of Directors and is a data amendment to the OC SCS. The dataset

includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this letter also serves as the formal notice of the update that should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.

**OCP-2010 Modified Recommendation:** All documents, tables, maps, narrative, modeling runs, PEIR Alternatives (including Alternate C/3/Envision 2 referencing the Orange County growth forecasts) should be updated with the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors and consistent with the subregional delegation MOU between OCCOG, OCTA and SCAG.

## **2. DRAFT RTP/SCS**

**Issue: 2012 Draft RTP/SCS:** The RTP/SCS identifies strategies to reduce greenhouse gas emissions from cars and light duty trucks. Because counties, jurisdictions and agencies have different needs and feasibility of implementation, we believe these strategies should be clearly identified as a menu of options that can be used to achieve the goal of reduced GHG emissions. However, the document can be construed to suggest that each of the strategies listed in the table on pages 150-153 are necessary to successfully implement the SCS, many of which are beyond SCAG's purview or control. It is requested that the language be clear that it is permissive.

### **2012 Draft RTP/SCS Requests:**

- 1. Revise language on page 149: "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which that help can and should undertake in order to successfully implement the SCS."**
- 2. Please provide SCAG analysis supporting the strategies in the Draft RTP/SCS Chapter 4.**
- 3. Please describe what municipal obligations are anticipated as a result of adopting these strategies as a list to be accomplished rather than a menu of options.**

**Issue: OC SCS Strategies:** There are strategies in the Orange County SCS that are not included in the regional SCS. Similarly, there are some strategies in the regional SCS that are not consistent with the strategies in the OC SCS. This creates confusion and clarification is needed.

Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional SCS's that SCAG is then required to incorporate into the regional SCS. In Orange County, the Orange County Council of Governments (OCCOG) and the Orange County Transportation Authority (OCTA) developed a countywide or subregional SCS (OC SCS) that was to be incorporated in whole into the SCAG SCS. Local agencies in Orange County developed the OC SCS and approved it in June 2011. SCAG has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the regional SCS, but it is unclear what the standing is of the OC SCS. The OC SCS contains a set of strategies that were agreed upon by local governments, agencies and other stakeholders within Orange County and was accepted by SCAG and should represent the SCS that is applicable to the Orange County region.

**OC SCS Strategies Recommendation:** Please revise the text in the last paragraph on page 106 to state: **“These subregional SCS documents are incorporated into the regional SCS and represent the SCS for each of these subregions.”**

### **3. DRAFT PEIR**

**Issue: Mitigation Monitoring Program Intent:** It is unclear how SCAG intends to implement the Mitigation Monitoring Program with regard to the proposed mitigation measures, as may be implemented by local agencies. Section 1-5 of the PEIR specifically provides that “Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG’s monitoring efforts, including SCAG’s Intergovernmental Review (IGR) process.” It is infeasible for SCAG to require local jurisdictions to report when such mitigation measures are considered for any project. Noting that the SCAG region includes 6 counties, 14 subregional entities and 191 cities, this reporting requirement would surely fall short of expectations. Given this identified infeasibility, please clarify what obligations local agencies may have regarding SCAG’s mitigation monitoring efforts.

#### **Mitigation Monitoring Program Intent Requests/Recommendations:**

- 1. Does SCAG intend to require all jurisdictions that avail themselves of the mitigation measures to report to SCAG when such measures are considered for any project?**
- 2. SCAG’s approval of the PEIR needs to clearly state the intent and applicability of the mitigation measures and the PEIR reflective of our comments below and that mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.**

**3. Add language to Executive Summary and Introduction:  
“Mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.”**

**4. Feasibility and Applicability**

On pages 1-5 and 1-7, the language should reflect that Lead agencies will determine the feasibility and applicability of measures and that the measures are intended to offer a menu of options available should a lead agency opt to utilize them. The PEIR makes the assertion on page 1-7 of the Project Description under Transportation Project Mitigation and Land Use Planning and Development Project Mitigation sections that the draft PEIR has made a preliminary determination that all of the mitigation measures in it are considered feasible. SCAG has not identified any analysis that supports the feasibility of the mitigation measures that are to be undertaken by entities other than SCAG and SCAG staff has stated on numerous occasions that the mitigation measures were intended to be a menu of options for consideration by lead agencies.

**Issue: Mitigation Measures Impose Obligations Beyond Scope of SB 375.**

Given the combination of the RTP and the SCS processes, as mandated by SB 375, we recognize that SCAG must undertake the difficult task of balancing the goal of having a coordinated regional transportation system with land use strategies that encourage a more compact use of land. However, a key principle of SB 375 is that it is not intended to supersede local agencies' authority to regulate land uses. Specifically, Government Code section 65080(b)(2)(K) provides, in relevant part that “. . . Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. . .”

In light of the limitation expressed at Government Code sec. 65080(b)(2)(K), we find language in the PEIR, and specifically the mitigation measures therein, imposing affirmative obligations on local agencies within the SCAG region to be inappropriate and contrary to law. The proposed language as recommended below would remedy the legal conflict with Section 65080(b)(2)(K), yet achieve SCAG's recognition that project-specific environmental review is the appropriate level of review for projects that that have their own unique, site-specific circumstances.

The revisions are further consistent with OCCOG's understanding that SCAG intended to provide the mitigation measures as a "toolbox" to local agencies for use within their discretion if and when appropriate for projects within their respective jurisdictions. Indeed, from materials presented by SCAG, including the January 26, 2012 workshop held at the City of Anaheim Council Chambers, SCAG explained that **“This PEIR offers a “toolbox” of mitigation measures for future project-level environmental analyses. . . . It also includes suggested mitigation measures for local agencies to consider for implementation, if**

appropriate and feasible (phrased as “can and should”). This language is permissive and not mandatory upon local agencies.”

**Mitigation Measures Impose Obligations Beyond Scope of SB 375 Recommendations:**

1. Please provide SCAG analysis supporting the feasibility of mitigation measures in the PEIR.
2. Change language on page 1-7 found in 2 places under MITIGATION MEASURES, subheadings Transportation Project Mitigation and Land Use Planning and Development Project Mitigation: “This Draft PEIR has made a preliminary determination that the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them where, in the agencies’ independent discretion, the measures are deemed applicable in light specific circumstances at the project level.”
3. Change language on page 1-5, first paragraph: “Mitigation Measures proposed in this PEIR are available as tools for implementing agencies and local lead agencies to use as they deem applicable. The implementing agencies and local lead agencies are responsible for ensuring adherence to the mitigation measures as 2012-2035 RTP/SCS projects are considered for approval over time.”
4. Please make similar text amendments to other sections, including the Executive Summary, of the PEIR that reference how the mitigation measures are to be used by lead agencies, including the Executive Summary.
5. **“Can and Should”**

As indicated in the PEIR on page 1-6, state law provides that it is appropriate to indicate in mitigation measures that they “can and should” be implemented where the authority to implement the measures rests with agencies other than SCAG. The language conveys to local agencies an affirmative obligation to address each mitigation measure, irrespective of whether such agencies deem the measures applicable to a particular project or duplicative of their own or other governmental agencies’ regulatory measures. OCCOG recognizes that SCAG’s use of the words “can and should” are derived from CEQA, at Public Resources Code sections 21081 and 2155.2(b)(5)(B)(ii) and CEQA Guidelines, including section 15091(a)(2). Nevertheless, given the express limitation of SB 375 upon respective local agencies’ land use authority, OCCOG deems any language seemingly imposing affirmative obligations contrary to SB 375 inappropriate. As

such, the use of the language "can and should" for mitigation measures addressed to local agencies is inappropriate.

**"Can and Should" Recommendations:** Change language in all mitigation measures identifying entities other than SCAG to read "~~can and should consider where applicable and feasible.~~" To clarify the intent that the mitigation measures are a menu of options for which feasibility has not been established for any given project, the "can and should" language should be changed in all mitigation measures identifying entities other than SCAG to read "should consider where applicable and feasible."

#### **6. CEQA Streamlining:**

Pages 1-10 through 1-12 describe requirements for the CEQA streamlining offered under SB 375. In each section, it is indicated, consistent with SB 375, for projects to qualify for the CEQA streamlining, mitigation measures from the applicable environmental document must be incorporated into the project. Further, CEQA streamlining relative to the infill exemption under CEQA is also being developed pursuant to SB 226 passed last year.

**CEQA Streamlining Recommendations:** Please clarify how the "menu of mitigation measures" is expected from this PEIR for project to qualify for CEQA streamlining under SB 375 and, if possible, the regulations being developed under SB 224.

#### **7. RTP/SCS Policies**

Please ensure that the discussion of the policies represented by the RTP/SCS in the draft PEIR is consistent with the policies actually in the RTP/SCS. In particular, the bullet list on the page 2-3 is stated to represent the land use strategies of the plan; however, the strategies listed are not specifically identified in the regional SCS. Including different language in the PEIR implies additional policy.

**RTP/SCS Policies Recommendation:** Amend the land use strategies identified on page 2-3 of the Project Description, under the section Purpose and Need for Action to reflect the strategies included in the SCS chapter of the RTP.

#### **8. PEIR Mitigation Measures**

By far the most concerning portion of the Draft 2012 RTP/SCS to OCCOG members is the Draft Program Environmental Impact Report (PEIR). Specifically, the proposed mitigation measures included in the PEIR extend to and impact a broad spectrum of technical and policy areas. Many examples of these concerns

are included on Attachments 1 and 2 of this letter. In sum, the concerns are that the mitigation measures:

- Appear to go above and beyond the requirements of the Regional Transportation Plan and Senate Bill 375;
- Are measures already required by State and Federal law or are regulated by other agencies such as the South Coast Air Quality Management District, California Department of Housing and Community Development, Fish and Game, and the Regional Water Control Boards;
- Appear to run counter to local control; and
- Are financially infeasible for the agencies responsible for implementation.

### **PEIR Mitigation Measures Recommendations.**

- 1. In order for the mitigation measures to truly be considered a toolbox of options for consideration by various entities in the SCAG region as intended, all mitigation measures in the PEIR intended for entities other than SCAG be moved into an appendix to the PEIR and renamed “Sustainability Strategies”. These strategies could then be identified for consideration by lead agencies as mitigation for future projects should a lead agency choose to do so and deem them applicable and feasible. The PEIR would only retain mitigation measures applicable to SCAG. This action would also require that the Executive Summary, Introduction, and Project Description be updated to reflect the nature of the new appendix of Sustainability Strategies.**
- 2. Remove language within mitigation measures that establishes policies not included in the RTP/SCS or modifies the measure to specify a policy or endorses specific technology which would limit agency authority.**
- 3. In the draft PEIR, please replace text in all mitigation measures that identify policy for either SCAG or other entities with language that reflects either adopted SCAG policies or are policies that are included in the RTP and SCS. Mitigation measures should not be used to establish new policy for the region.**

For example:

- MM-TR 17: “SCAG shall (for its employees) and local jurisdictions ~~can and~~ should institute where applicable and feasible teleconferencing, telecommute, and/or flexible work hour programs ~~to reduce unnecessary employee transportation.~~

- MM-TR 23: “Local jurisdictions should consider when applicable and feasible coordinated and controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of a feasible, energy efficient Light Emitting Diode (LED) technology.”
- MM-TR 35: “Local jurisdictions should consider where applicable and feasible the adoption of a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation.”

## 9. SCAG Authority

Several mitigation measures identify actions that SCAG shall undertake to mitigate impacts of the plan. Many appropriately direct SCAG to provide a discussion forum or serve as a central data repository for a broad range of topics that affect the region as a whole. However, many measures inappropriately direct SCAG to establish practices, standards, or policy in areas unrelated to what SCAG has purview over. Further, the measures often appear to be directed at policy implementation that is unrelated to the plan itself, such as implementing AB 32. Such measures will essentially require SCAG to establish policy in areas for which it has no authority. Additionally, it is not clear how SCAG would fund the work efforts because they are not directly related to its mission and, therefore, do not have funding. For example, MM-PS 118 states: “SCAG shall continue to develop energy efficiency and green building guidance to provide direction on specific approaches and models and to specify levels of performance for regionally significant projects to be consistent with regional plans.” Green building practices and energy efficiency measures are already addressed by various state and federal agencies, as well as by other local organizations. Further, SCAG does not have the authority to specify levels of performance for land use or buildings.

**SCAG Authority Recommendation: Remove the following mitigation measures for SCAG which it does not have purview for under the law or directed to do by the Regional Council through policy direction. List may not be exhaustive.**

MM-BIO/OS 44	MM-LU 42	MM-LU 77	MM-PS 68
MM-BIO/OS 45	MM-LU 47	MM-LU 80	MM-PS 71
MM-BIO/OS 46	MM-LU 48	MM-LU 81	MM-PS 95
MM-BIO/OS 48	MM-LU 51	MM-LU 82	MM-PS 121
MM-GHG 3	MM-LU 53	MM-LU 83	MM-TR 17
MM-GHG 8	MM-LU 56	MM-NO 12	MM-TR 23
MM-GHG 11	MM-LU 57	MM-NO 16	MM-TR 28
MM-LU 9	MM-LU 60	MM-POP 1	MM-TR 35

MM-LU 21	MM-LU 61	MM-PS 3	MM-TR 83
MM-LU 22	MM-LU 64	MM-PS 14	MM-TR 85
MM-LU 24	MM-LU 65	MM-PS 25	MM-TR 96
MM-LU 26	MM-LU 69	MM-PS 37	MM-W 34
MM-LU 32	MM-LU 71	MM-PS 39	MM-W 59
MM-LU 34	MM-LU 74	MM-PS 41	MM-W 60
MM-LU 41	MM-LU 75	MM-PS 67	MM-W 65

## **10. SCAG Mitigation Measures**

It would be helpful to understand how SCAG will implement the mitigation measures that it is assigned to do. Many of the mitigation measures will expand SCAG's role into areas that are not currently under its purview and are under the jurisdiction of other entities. Many also constitute significant work efforts.

**SCAG Mitigation Measures Request:** Please explain how the actions and programs required by the measures SCAG is assigned to do would be funded to ensure that they are truly feasible for SCAG to undertake.

## **11. Ensuring Outcomes**

SCAG has limited authority in many of the areas included in the measures and will not be able to ensure impacts are mitigated and that the outcomes identified do actually occur. SCAG can assist, offer information, educate, and provide discussion forums for topics outside its area of jurisdiction; however, it is not possible to "ensure" that outcomes are achieved for things that are outside of its purview.

**Ensuring Outcomes Recommendation:** Remove all references within mitigation measures that SCAG will "ensure" or "shall minimize impacts" that result from a mitigation measures.

**Example:**

**MM-CUL17:** ~~"Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG's shall, through cooperation, information sharing and ongoing regional planning efforts such as web-based planning tools for local government including CA lots, and direct technical assistance efforts such as Compass Blueprint's Toolbox Tuesday series, provide information and assistance to local agencies to help them avoid impacts to cultural resources. Resource agencies, such as the Office of Historic Preservation, shall be consulted during this process."~~

## **12. Fees and Taxes**

Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation.

### **Fees and Taxes Recommendations:**

- 1. Reword measures to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. The following list may not be exhaustive.**

MM-BIO/OS55	MM-PS15	MM-TR30	MM-TR88
MM-LU29	MM-PS63	MM-TR37	MM-TR94
MM-LU53	MM-PS75	MM-TR47	MM-TR96
MM-LU54	MM-PS76	MM-TR52	MM-W6
MM-LU80	MM-PS78	MM-TR60	MM-W32
MM-LU81	MM-PS92	MM-TR69	MM-W52
MM-LU82	MM-PS106	MM-TR74	MM-W58
MM-LU83	MM-PS107	MM-TR75	
MM-POP4	MM-PS113	MM-TR80	
MM-PS12	MM-TR28	MM-TR84	

- 2. Please clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.**

## **13. Guidance Documents**

Guidance documents are there as information sources for consideration; however, they do not represent regulation or establish standards that are required to be achieved. For example, MM-AQ19 inappropriately indicates that project sponsors should comply with the CARB Air Quality and Land Use Handbook (June 2005) which is only a guidance document.

**Guidance Documents Recommendation: Remove references that indicate a compliance with guidance documents from mitigation measures.**

## **14. Duplicative/Existing Regulations**

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the California

Environmental Quality Act, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and the regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state law, and local laws and regulations.” Similar language is included in some mitigation measures. It is offered that MM-PS 13 is a good example of the type of appropriate language and reads “Project sponsors can and should ensure that projects are consistent with federal, state, and local plans that preserve open space.”

It is noted that many of the mitigation measures are duplicative of existing regulation or processes (e.g. CEQA review requirements). Under the California Environmental Quality Act, it is intended that measures be identified that will mitigate impacts of the project. Existing regulations are already assumed to be abided by in the evaluation of the impact and the significance of the impact is after all existing regulation is applied. Therefore, mitigation measures should address those actions that need to be undertaken in addition to existing regulation in order to mitigate the impact. Therefore, mitigation measures that simply restate existing regulation are not valid mitigation for purposes of CEQA. Further, it is possible for regulations to change over time. Because of this, restatement of the regulation in the mitigation measures could result in future conflict between the stated mitigation and the regulation. It has become common practice to state that existing regulation will be implemented. When this is done, it is common practice when compliance is used as a mitigation measure to simply state that the responsible entity will simply comply with the regulation. If mitigation measures that restate existing regulation are not removed, then it is requested that the wording of the measures be restated to simply read that compliance with all applicable laws and regulations will be undertaken. Language that could be used is: “Local jurisdictions, agencies, and project sponsors shall comply, as applicable, with existing federal, state law, and local laws and regulations.” Similar language is included in some mitigation measures. It is offered that MM-PS 13 is a good example of the type of

appropriate language and reads “Project sponsors can and should ensure that projects are consistent with federal, state, and local plans that preserve open space.” The water section provides another example. The PEIR includes 68 mitigation measures in the Water Resources section regarding water quality. At least 35 of these are related to stormwater runoff best management practices (BMPs) that are currently regulated through Municipal National Pollutant Discharge Elimination System (NPDES) Stormwater Permits issued by Regional Water Quality Control Boards. In the SCAG region there are five water quality control boards each with its own Municipal NPDES Stormwater Permit. The regulations and requirements contained in these permits vary from each other. By listing specific measures in the PEIR that are not included in a project’s applicable Municipal NPDES Stormwater Permit, the PEIR creates conflicting compliance requirements. To eliminate potential conflict with existing regulations, the mitigation measures regarding specific BMPs should be removed and replaced with a single requirement that each project must comply with its applicable Municipal NPDES Stormwater Permit.

#### **Duplicative/Existing Regulations Recommendations:**

- 1. Please remove all mitigation measures listed in Attachment 1 which are duplicative of existing regulations administered by or under the jurisdiction of other agencies. The list may not be exhaustive.**
- 2. For each impact, please add the following language: “Local jurisdictions, agencies, and project sponsors should comply, as applicable, with existing federal, state, and local laws and regulations.”**

#### **15. Draconian Mitigation Measures**

Many of the mitigation measures in the Draft PEIR are draconian and need to be removed. One prime example is MM-LU 85. It reads in part “Local jurisdictions can and should reduce heat gain from pavement and other hardscaping including: Reduce street rights-of-way and pavement widths to World War II widths (typically 22 to 34 feet for local streets and 30 to 35 feet for collector streets curb to curb)...” Although reduced street widths may be appropriate in some cases and have been implemented in many jurisdictions, it is inappropriate and counterproductive to require reduced street widths as a mitigation measure in the PEIR. Reduced street widths, for example, generally do not provide space for on-street parking which may result in greater, additional paved areas provided in separate parking lots. A second example is MM-LU15: “Project sponsors can and 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 transportation projects/improvements.” Measures should support the SCAG Energy and Environment Committee which recommended that the programs

build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA's Measure M Mitigation Program, and TCA's open space mitigation program, which has protected 2,200 acres in perpetuity to date. Open space conservation should be pursued in a voluntary manner, working with willing private sector landowners and not overly prescriptive and specific.

**Draconian Mitigation Measures Recommendations: Remove mitigation measures that are very prescriptive, such reducing street widths to WWII widths or specifying preferred technology.**

**Mitigation Measures Duplicative of Existing Regulation**

(Listed by type of regulation measures duplicates)

<b>Air Quality/AQMD</b>	<b>CDFG</b>	<b>Federal &amp; state law</b>	<b>Federal law</b>	<b>Resource agencies</b>
MM-AQ1	MM-BIO/OS1	MM-HM3	MM-LU14	MM-TR33
MM-AQ2	MM-BIO/OS3	MM-HM4	MM-LU30	MM-BIO/OS29
MM-AQ3	MM-BIO/OS4	MM-HM5		MM-BIO/OS30
MM-AQ4	MM-BIO/OS8	MM-HM6		MM-BIO/OS31
MM-AQ5	MM-BIO/OS10	MM-HM7	<b><u>NPDES</u></b>	MM-BIO/OS32
MM-AQ6	MM-BIO/OS11	MM-LU28	MM-AQ16	MM-BIO/OS33
MM-AQ7	MM-BIO/OS17	MM-NO18	MM-BIO/OS19	MM-BIO/OS34
MM-AQ8	MM-BIO/OS18	MM-PS13	MM-GEO5	MM-BIO/OS35
MM-AQ9	MM-BIO/OS21	MM-W36	MM-W1	MM-BIO/OS50
MM-AQ10	MM-BIO/OS22	MM-W37	MM-W13	MM-BIO/OS51
MM-AQ11	MM-BIO/OS23	MM-W38	MM-W58	
MM-AQ12	MM-BIO/OS24			
MM-AQ13	MM-BIO/OS25		<b><u>Flood control</u></b>	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		<b><u>Local Agencies</u></b>	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
<b><u>State law</u></b>				
MM-AV3	MM-HM10	MM-PS4	MM-PS107	MM-W25
MM-AV6	MM-HM11	MM-PS8	MM-PS113	MM-W26
MM-AV12	MM-HM12	MM-PS10	MM-PS119	MM-W27
MM-BIO/OS20	MM-HM13	MM-PS12	MM-PS122	MM-W28
MM-CUL1	MM-HM14	MM-PS14	MM-TR29	MM-W29
MM-CUL2	MM-HM15	MM-PS16	MM-TR49	MM-W30

MM-CUL3	MM-HM16	MM-PS35	MM-TR55	MM-W31
MM-CUL4	MM-LU10	MM-PS36	MM-TR75	MM-W32
MM-CUL5	MM-LU11	MM-PS37	MM-TR89	MM-W39
MM-CUL6	MM-LU17	MM-PS42	MM-W6	MM-W43
MM-CUL7	MM-LU19	MM-PS43	MM-W8	MM-W46
MM-CUL8	MM-LU20	MM-PS48	MM-W9	MM-W47
MM-CUL9	MM-LU38	MM-PS55	MM-W10	MM-W48
MM-CUL10	MM-LU43	MM-PS56	MM-W11	MM-W49
MM-CUL11	MM-LU44	MM-PS57	MM-W12	MM-W50
MM-CUL12	MM-LU48	MM-PS59	MM-W15	MM-W51
MM-CUL13	MM-LU58	MM-PS61	MM-W16	MM-W52
MM-CUL15	MM-NO1	MM-PS67	MM-W17	MM-W54
MM-CUL16	MM-NO4	MM-PS69	MM-W18	MM-W55
MM-GEO1	MM-NO8	MM-PS71	MM-W19	MM-W56
MM-GEO2	MM-NO9	MM-PS73	MM-W20	MM-W61
MM-GEO3	MM-POP2	MM-PS77	MM-W21	MM-W62
MM-GEO4	MM-POP4	MM-PS89	MM-W22	MM-W64
MM-GEO6	MM-PS1	MM-PS92	MM-W23	MM-W66
MM-HM9	MM-PS2	MM-PS97	MM-W24	MM-W68

Additional Technical Clarifications on documents are also offered as follows:

**2012 RTP/SCS**

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION	COMMENT &
1	General Comment	all		<i>All chapter headings should include the Chapter number on each page for ease of reference.</i>
2	Clarification	1, left column		"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to <u>comply with SB 375</u> , <del>both</del> improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. As
3	Clarification	4, right column		"This region needs a long-term, sustainable funding plan that <u>ensures the region receives its fair share of funding</u> , supports an efficient and effective transportation system that grows the economy, provides mobility choices, and improves our quality of life."
4	Clarification	page 7- Table 2 and page 95- Table 3.3		<i>Is additional \$0.15 gas tax the sum total of both state and federal taxes or \$0.15 each?</i>
5	Clarification	40, left column		"Strategic investments, <u>put forth by the private sector</u> , that would remove barriers associated with telecommuting are expected..."
6	Correction	page 42- Table 2.2		241 toll road completion year is <u>2030</u>
7	Please define in the text and add to a glossary	50, left column		"scrip"
8	Clarification	54, right column		"Express/HO T Lane Network Despite our concerted effort to reduce traffic congestion through years of infrastructure investment, the region's system demands continue to exceed available capacity <u>during peak periods.</u> "
9	Clarification	70, 78		Greenhouse Gases and Air Quality SCAG seems to rely on CEQA to achieve the "maximum feasible" reductions in emissions from transportation. However, this is not consistent with the intent of SB 375's goal of achieving specific thresholds of 8% by 2020 and 13% by 2035 through a sustainable communities strategy plan.



#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
		column	<p>Text indicates that the RTP and projects in the RTP/SCS as “inducing” growth. It is noted that use of the term “induced growth” has a negative connotation and implies growth above and beyond what would occur naturally. However, it is stated in the RTP that the population, housing, and employment growth totals are fixed and only the distributions may change based on the plan. This means there will not be “new” growth and that the RTP and SCS may simply influence and shift the growth anticipated for the region. This moving of growth is the result of changes in distribution that are due to changes in land use or densities. Because of this, it is requested that references to “induced growth” be reworded to reflect the shifting of growth in the region.</p> <p><i>Recommended text change:</i> “Cumulative impacts from the projected growth <u>induced by the RTP</u> include increased impervious surfaces;...”</p>
12	Clarification	Chapter 3	<p>SCAG’s Financial Plan includes a significant portion of “New Revenue Sources and Innovative Financing Strategies” that are not currently in place or available. While some of the proposed revenues are within the control of SCAG or MPOs and County Transportation Commissions, the majority of the revenues (in terms of dollars) require either state or federal action to implement.</p> <p><i>Please explain what the implications are if these new revenue sources and innovative financing strategies do not become available?</i></p>
13	Clarification	page 95- Table 3.3	<p><del>“Mileage based user fees would be implemented to replace gas tax and augment estimated at about \$0.05 (2011\$) per mile and indexed to maintain purchasing power starting 2025.”</del></p> <p>Suggested language is from page 31 of Growth Forecast Appendix:  <u>“Current gasoline tax, estimated at about \$0.05 (2011\$) per mile will increase through 2025, then in 2026 it would be replaced with a mileage-based user fee indexed to maintain purchasing power.”</u></p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
14	Clarification	105, right column	"While the region was once known worldwide as the "capital of sprawl," the region today <u>is projecting growth on only a small fraction of the <del>has little</del> raw land available in the region left to accommodate additional growth.</u> "
15	Clarification	105, right column	"While the region was once known worldwide as the "capital of sprawl," the region today <u>is projecting growth on only a small fraction of the <del>has little</del> raw land available in the region left to accommodate additional growth.</u> "
16	Clarification	106	SCAG indicates that the OC SCS has been incorporated into the regional SCS. OCCOG was one of two subregions that undertook the arduous task and obligation of preparing an SCS.  <i>Please add clarifying text that these subregional SCSs, including the OC SCS, represent the Sustainable Communities Strategies applicable to those subregions.</i>
17	Clarification	110, right column	"Municipal water and sewer systems, for example, ensure clean water. At the same time, <u>concrete stormwater runoff channels harm water quality and sprawl eats into open space as areas become more urbanized and the percentage of impervious surface is increased, the hydrologic regime is dramatically altered. Drainage conveyances that once were natural and riparian are required to be engineered as hardened flood control channels to provide adequate protection of private property and public infrastructure from the increased frequency, duration, peak flow, and overall volume of stormwater runoff. With this armoring of once natural channels, water quality benefits from biofiltration are lost along with opportunities for infiltration and evapotranspiration, which can lead to hydromodification downstream in sections which are not yet engineered and hardened. Many strategies...</u> "
18	Clarification	112, 117	The SCS documents the development of four scenarios to explore basic aspects of future growth. These scenarios were used in public outreach and the SCS and the associated Appendix states that "Using the public dialogue and feedback from the analysis of the SCS Scenarios, SCAG developed

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION COMMENT &
			<p>the 2012 RTP/SCS Plan alternatives.” (Similar references are also include at RTP/SCS p. 117, and SCS Background Documentation p. 71). The RTP/SCS and Appendix then describes a process that led to the Plan alternatives. Neither the RTP/SCS, Appendix or PEIR expressly state or illustrate the fundamental land use and socioeconomic foundation for the SCS.</p> <p><i>In order to confirm consistency with the OC SCS, it is requested that SCAG include appropriate tables, graphics and maps that provide the detail that confirm this consistency.</i></p>
19	Clarification	113, 122	<p>The regional SCS states that the scenarios/alternatives were developed using the Local Sustainability Planning Tool (LSPT). The LSPT is a sketch planning tool that flattens geographical areas to a 5-acre grid cell. The OC SCS land use data was provided at much greater level of detail in that specific parcel data and detail were provided by each jurisdiction. A cursory review of some LSPT data reveals inconsistencies regarding interpretation of Orange County land uses.</p> <p>It is acknowledged that the regional SCS states, "Land use inputs for OCCOG SCS were unchanged". Yet use of the LSPT and SCAG Development and Community Types presented in the SCS leave open the question as to whether the OC SCS was altered, as noted above.</p> <p><i>Please provide confirmation that the underlying OC SCS land use data was used without significant alteration and LSPT flattening and interpretation in the development of the regional SCS Plan and alternatives.</i></p>
20 17	Add to glossary	127, right column	"Gentrification"
21	Clarification	128, left column	<p>"Thus, this adjustment allowed the land use pattern to conform more closely to local <u>expectations general plans</u>, while reducing the amount of vehicle miles traveled."</p>

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION	COMMENT &
			<i>Whose/What are "local expectations?"</i>	
22	Clarification	149, right column	<p><i>Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.</i></p> <p><i>"The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders <u>may use or consider while preparing specific projects which would help ean-and-should undertake in order to</u> successfully implement the SCS."</i></p>	
23	Clarification	150-152	<p>The OC SCS was accepted by SCAG and represents the set of strategies and the growth distribution that outlines the best approach for how the requirements of SB 375 would be met within the subregion. Specifically, the OC SCS included 15 specific Sustainability Strategies, reflecting a menu of 222 practices and actions that OC agencies have agreed to pursue (or continue to pursue) to achieve GHG reductions that support SB 375.</p> <p><i>Why doesn't the regional SCS specifically acknowledge these 15 strategies yet include other strategies and performance measures not included in the OC SCS (e.g., Locational Efficiency)?</i></p>	
24	Add to glossary	166, right column	"Greenfield"	
25	Clarification	194, right column	<p><i>"In addition to these targeted outreach efforts, all regular and special meetings of the RTP task forces, the Transportation Committee (TC), <u>the CEHD, the EEC,</u> and the SCAG Regional Council are publicly noticed and ..."</i></p>	
26	Clarification	201	<p><i>Please clarify whether the text stating "Long-term emission reduction for rail, with a goal of zero-emissions rail system" is intended to reflect a zero-emissions freight rail system, or whether this goal also applies to passenger rail.</i></p>	
27	Clarification	202, 203- Table 7.1	<p>Unfunded operational improvements, of which several are listed on page 203, Table 7.1, include transit station improvements in Irvine, Fullerton, and Santa Ana, bus rapid transit (BRT) in Orange County, and high speed rail (HSR) Phase II.</p> <p><i>Please confirm that these are consistent with the</i></p>	

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, RECOMMENDATION	COMMENT &
			OC SCS.	
28	Clarification	207	Strategic Finance	
			<i>Please explain what will happen if reasonably foreseeable revenue sources of approximately \$200 million do not become available?</i>	
29	Add to glossary	205	"Active transportation"	

#### GROWTH FORECAST APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, RECOMMENDATION	COMMENT &
1	Updated growth forecast numbers	23, Table 13	In December 2011, Orange County provided SCAG with the revised growth forecast dataset, OCP-2010 Modified, per the OC SCS MOU (official OCCOG Board action 1/26/2012).	
			<i>Please incorporate revised Orange County numbers (i.e. OCP-2010 Modified) into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.</i>	

#### PERFORMANCE MEASURES APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, RECOMMENDATION	COMMENT &
1	Clarification	1	The document states, "The performance measures are used to evaluate how well the RTP/SCS addresses the adopted goals and performance outcomes."	
			<i>Is there any formal role for the performance measures?</i>	
			ARB will evaluate for SB 375 compliance not based on these measures but based on ARB process.	
			<i>Please include language clarifying that this is a requirement to demonstrate compliance with federal requirements and not for the obligations under SB 375.</i>	

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	Clarification	1, end of first paragraph	<p>Add statement: <u>“Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.”</u></p>
3	Clarification	1, column 2	<p>The document states, “The Regional Council will formally adopt the goals and outcomes as part of the final 2012 RTP/SCS.”</p> <p><i>Does this bring any formal obligation to meet goals? Goals are general, flexible, and aspirational rather than specific, as on p.1.</i></p>
4	Clarification	13, Table 8	<p>The RTP/SCS claims an extra 2% CO<sub>2</sub>e emissions reduction in 2035 from the NHTS post-processing analysis. While the RTP/SCS meets the ARB SB375 goal without the extra 2%, we would like to note that the extra 2% could be important if the attorney general raises concerns about backsliding. Consequently, the reliability of the extra 2% reduction should be checked. Questions on the NHTS model are below.</p> <p>It would be useful to know the answers to better judge the quality, although we do note that the report does look like it meets the standards or best practice.</p>
5	Clarification	9	<p>NHTS Model Documentation Report</p> <p><i>Are the auto and bus accessibility variables included in the regression models for 30-mile rings?</i></p> <p><i>In “Number of trips” model – is number of cars, included as an independent variable, the actual or predicted value?</i></p> <p><i>The same question applies to other models.</i></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	23, Table 10	NHTS Model Documentation Report  <i>Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample?</i>
7	Clarification	24, Test 3	NHTS Model Documentation Report  (Compare Trip-Based and NHTS Model): The final test was to compare the results of the Trip-Based Model and the NHTS Model for the same scenarios.  <i>Please describe the scenarios tested.</i>

#### TRANSPORTATION FINANCE APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	General	<i>What are the implications if revenues other than core revenues do not become available?</i>  <i>Please describe any implications to the ability of the region to meet SB 375 GHG emission reduction targets or the federally required air quality conformity?</i>

#### SCS BACKGROUND DOCUMENTATION APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Please define	53, right column	Housing Options and Mix:  Define Larger-lot single family in text
2	Clarification	71-74, 80-83	Alternatives naming: A, B, C  Names of Alternatives differ than those listed in the PEIR on pages ES-3 and 1-4.  <i>Please be consistent with naming protocol for alternatives between two/all documents.</i>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
3	Revise language to clarify	71, right column	<p>“Plan Alternative (B)  ... The alternative maintains city-level forecast control totals for both households and jobs, however, within city boundaries shifts are made to focus a much larger share of future growth in a more compact way around HQTAs, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u> Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family <u>housing</u> housing.”</p>
4	Please define	71, right column	<p>Plan Alternative (B)</p> <p>Define small lot single family in text</p>
5	Revise language to clarify	71, right column	<p>Plan Alternative (C)</p> <p>“As a result very suburban communities may experience no new <u>housing or employment</u> growth, while some urban areas with very good access to regional transit may experience significant increases in <u>housing or employment</u> growth.”</p>
6	Revise language to clarify	72, left column	<p>“While each alternative is distinctive, a number of parameters remained constant across each alternative: the regional RTP/SCS forecast total for <u>population, households and jobs;</u>...”</p> <p>“Detailed forecast: the detailed distribution of <u>population, households, and jobs</u> across the region...”</p>
7	Revise language to clarify	72, Table D1	<p>Alternatives A &amp; B:</p> <p>“Controlled to TAZ-based RTP/SCS Forecast for 2020; Controlled to city-level RTP/SCS Forecast for 2020-2035, <u>except in Gateway and Orange County COG subregions per their SCS delegation agreements.</u>”</p> <p>Add statement to table notes: <u>Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.</u></p>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Revise language to clarify	74, Table D2	Alternatives A & B: Add statement: <u>Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u>
9	Clarification	75, right column	"Development Types The alternatives are built on, and provides data at, the level of the TAZ, which includes housing units and employment."  <i>Please clarify if TAZ is Tier 1, Tier 2, or both.</i>
10	Revise language to clarify	79, right column	"Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected <u>unchanged</u> and integrated into the alternatives (with possible revisions for Alternative C only)."
11	Clarification	79	The section includes the following language: "Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected and integrated into the alternatives (with possible revisions for Alternative C only)."  <i>Please clearly indicate what the "possible revisions" are and what process would be used to coordinate with Orange County should changes to the socioeconomic data contained in the OC SCS be proposed?</i>
12	Revise language to clarify	80	Alternative A Add statement: <u>Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u>

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
13	Revise language to clarify	81	<p>Alternative B</p> <p>It is not clear whether Alternative B is the SCS land use plan. If it is, statements in the appendix lead one to believe the OC SCS foundation has been altered. For example, adjustments made to land uses to locate proximate to High Quality Transportation Areas (HQTA) and intensification of residential and employment development in HQTA that diverge from local General Plans as well as implementation of a vehicle user fee are not part of the OC SCS.</p> <p><i>Is Alternative B the SCS land use plan?</i></p> <p><u>Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.</u></p>
14	Clarification	115, left column	<p>Transit Zoning Code Santa Ana 2011</p> <p><i>Is this a duplicate of the 2010 Santa Ana project?</i></p>

**PEIR**

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	Revise language to clarify	ES-2	<p>ES contains matrix of mitigation measures which reference project sponsors, local agency, and project implementation agency without definitions. Add definitions into ES at end of ES.1:</p> <p><u>In general, the terms “local agency,” “project sponsor” and “project implementing agency” are used throughout this PEIR to identify agencies, organizations, companies and individuals that will act as lead agencies or project applicants for different types of individual projects. Individual projects that are anticipated to occur pursuant to the 2012-2035 RTP/SCS consist of planning projects (general plans, specific plans, climate action plans, etc.), development projects (including Transit Priority Projects (TPPs) and other similar projects), and transportation projects.</u></p> <p><u>In general, “local agency” is used to refer to a public agency that would propose a planning project or a public infrastructure project and/or an agency that would be lead agency for individual projects. “Project sponsor” is typically used to refer to an applicant (that could be public or private, an organization or an individual) that proposes a project. “Project implementing agency” is used to refer to an agency responsible for implementing a project. In this document, project-implementing agencies are those that are responsible for carrying out (reviewing, approving, constructing) transportation projects.</u></p>

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
2	Clarification	ES-3, 1-4, Chapter 4	<p>Alternatives' Naming: No Project Alternative, Modified 2008 RTP Alternative, Envision 2 Alternative; Alternatives 1, 2, 3</p> <p>Names of Alternatives differ than those listed in the SCS Background Documentation appendix on pages 71-74 and 80-83.</p> <p><i>Please be consistent with naming protocol for alternatives between all documents.</i></p>
3	Fix numbering	ES-31	Duplicate naming of GHG11 and GHG12
4	Please define	ES-42	LU63- What are the smart growth principles?
5	Please define	ES-42	LU64- What are the benchmarks for smart growth?
6	Fix numbering	ES-51	PS17 & PS18 are missing
7	Fix numbering	ES-53	Duplicate naming of PS36 & PS37
8	Please define	ES-67	TR 34- what are the identified transportation benchmarks?
9	Please define	ES-83, 3.13-42 MM-W43	Define climate change hydrology
10	Please define	ES-40, 3.8-21 MM-LU42	Define urban growth boundary
11	Please define	ES-57, 3.11-49 MM-PS68 & ES-74, 3.12-43 MM-TR96	Define parking cash out program/ cashouts
12	Clarification	1-5	<i>Besides IGR, what other monitoring efforts is SCAG in charge of? (that would require lead agencies to provide SCAG with documentation of compliance with mitigation measures)</i>
13	Language correction	1-6, paragraph 3	Language correction: "The latter <b>former</b> finding..."

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
14	Language correction	2-5	<p>Sustainability section should be separated.</p> <p>Language correction:  <b>Sustainability.</b> The 2012-2035 RTP/SCS is subject to specific requirements for environmental performance.</p> <p><b><u>New paragraph:</u></b>  “Beyond simply meeting these requirements, a ...”</p>
15	Language correction	2-5, Table 2-2	“Align the plan investments and policies with <b>while</b> improving...”
16	Please define	2-14	Define “scrip”
17	Narrative	2-21	<p>AB 32 is global warming solutions act. SB 375 was determined to be stand-alone legislation. RTP document is not forum to address global climate change and references distract from RTP goal and purpose. “Global warming” and “global climate change” are not interchangeable phrases. References should be removed or, where appropriate, language should be changed to “global warming”.</p> <p><del>Goods movement is also a major source of GHG emissions that contribute to global climate change.</del></p>
18	Clarification	2-27 paragraph 4	<p>Not in SCAG’s authority, nor funding available. Delete sentence:  <del>SCAG will work with local jurisdictions and community stakeholders to seek resources and provide assistance to address any possible gentrification effects of new development on existing communities and vulnerable populations.</del></p>
19	Clarification	2-27 paragraph 5	<p>“The 2012-2035 RTP/SCS land use development pattern accommodates over 50 percent of new housing and employment growth in HQTAs, while keeping jurisdictional totals consistent with local input.”</p> <p><i>Please confirm that there are no changes to the local land use inputs provided by Orange County.</i></p>

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	2-29	<p>“For purposes of SCAG’s SCS, a Development Type reflects an estimated average density of 22 residential units per acre. However, it is important to note that the designation is a potential ultimate average for the TAZ—and is not an absolute project-specific requirement that must be met in order to determine consistency with the SCS. In other words, the SCS was not developed with the intent that each project to be located within any given TAZ must exactly equal the density and relative use designations that are indicated by the SCS Development Type in order for the project to be found consistent with the SCS’s use designation, density, building intensity and applicable policies. Instead, any given project, having satisfied all of the statutory requirements of either a residential/mixed-use project or TPP, may be deemed by the lead agency to be consistent with the SCS so long as the project does not prevent achieving the estimated average use designations, densities and building intensities indicated by the Development Type within the TAZ, assuming that the TAZ will be built-out under reasonable local planning and zoning assumptions.”</p> <p><i>Does the above PEIR language create a requirement for average TAZ density levels in 2035 and a requirement that each local project not preclude those density levels?</i></p> <p><i>Additionally, please clarify whether in HQTAs, these densities could be exceeded as well as implications of an area that is already fully developed not redeveloping such that it ever achieves the identified densities.</i></p>
21	Please define	3.8-5 paragraph 3,	Define “open space”

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
22	Revise language to clarify	4-39	<p>Envision 2 alternative contains growth projections that would place housing in flight paths, locate housing on sites for which housing is not allowed due to environmental contamination, would significantly impact existing industrial operations necessary to maintain quality jobs in the region, and does not include development projects that are legally allowed due to having existing entitlement for development. Because this alternative does not consider the existing health and safety of future residents nor the existing legal approvals of development in the region, it is not possible to determine if the alternative is actually superior to other alternatives. It is simply another alternative for consideration.</p> <p><i>Please remove references to the Envision 2 (or any other name of this alternative) as being environmentally superior.</i></p> <p><del>ENVIRONMENTALLY SUPERIOR</del> ENVISION 2 ALTERNATIVE</p>
23	Revise language to clarify	4-40	<p>"Of the three alternatives, the Envision 2 Alternative would be considered <u>by State CEQA guidelines as the environmentally superior alternative</u> because it does not allow further use of land for single-family development..."</p>



February 14, 2012

Jacob Lieb  
SCAG  
818 W. 7th Street, 12th Floor  
Los Angeles, CA 90017

Via U.S. Mail and Email to: 2012PEIR@scag.ca.gov

Subject: Comments on the Draft PEIR for the 2012-2035 RTP/SCS

Dear Mr. Leib:

Thank you for the opportunity to comment on the Draft Program EIR for the 2012-2035 RTP/SCS. City of Lake Forest Staff has been involved with the review of the documents as facilitated by the Orange County Council of Governments (OCCOG) Technical Advisory Committee (TAC) and would like to express our sincere support and agreement with the comments submitted by the OCCOG Board. In addition to the comments of the OCCOG, the following comments are offered on the Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (draft RTP/SCS) and the associated Appendices and draft Program Environmental Impact Report (draft PEIR).

### General Comments

- Concern with the timeline. We recognize the immense efforts it took to prepare these documents. They are incredibly complex documents establishing important and far-reaching policy for the region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents. The timeline of document release, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because the timeline does not allow for recirculation or full discussion of requested changes. The documents were released over the holiday season and included the release of draft PEIR document on December 30, 2011. The minimum 45-day public comment period closes on February 14, 2012. Only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 4, 2012.

Mayor  
Kathryn McCullough

Mayor Pro Tem  
Scott Voigts

Council Members  
Peter Herzog  
Marcia Rudolph  
Mark Tetteimer

City Manager  
Robert C. Dunek

- Growth Forecasts. It is requested that the adoption of the growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs. Planning documents need to be flexible. Smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell would limit jurisdictional control over land use.
- Growth Forecasts. The OCCOG Board approved the update to the OCP-2010 dataset used in the OC SCS. OCP-2010 Modified was officially approved by the OCCOG Board on January 26, 2012 and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this is the formal notice of the update which should be incorporated into the 2012 RTP/SCS, PEIR, and related documents. To be consistent with the MOU on subregional delegation between OCTA, OCCOG, and SCAG, all documents, tables, maps, narratives, modeling runs, PEIR alternatives (including Alternate C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.
- Intended Use of the PEIR. The applicability of the PEIR and its 550 mitigation measures to projects throughout the region should be clarified. Specifically, additional language is needed to reflect that lead agencies will determine the feasibility and applicability of measures to specific projects under local jurisdiction.
- PEIR Mitigation Measures. SCAG Staff has indicated that the mitigation measures in the PEIR are intended to represent a menu of options for implementation with projects, as determined appropriate and feasible. However, the concept of a menu of options is not clear in the PEIR. We request added language to clarify the applicability of the mitigation measures to projects undertaken or approved by local government.
- PEIR Mitigation Measures. Hundreds of mitigation measures in the PEIR use the language "can and should". For example – "Local jurisdictions can and should meet recognized 'smart growth' benchmarks." We are concerned that the word "can" indicates that the measure has already been determined to be feasible. Additionally, we are concerned that this language does not support the use of the mitigation measures as a menu of options for local use. We recommend that the words "can and" be removed in all instances, leaving the language "should" as clearly optional.

Mr. Jacob Leib  
February 14, 2012  
Page 3 of 3

- PEIR Mitigation Measures. Many mitigation measures have been identified which appear to expand SCAG's purview. Specifically, the OCCOG Board's letter identifies in its attachments proposed mitigation measures which extend to a broad spectrum of technical and policy areas. We echo the concerns of the OCCOG Board and affirm that mitigation measures should not be used to establish policy for the region.

Should you have any questions regarding this letter, please contact Cheryl Kuta, Planning Manager at (949) 461-3479 or via email at [ckuta@lakeforestca.gov](mailto:ckuta@lakeforestca.gov).

Sincerely,  
CITY OF LAKE FOREST



Gayle Ackerman, AICP  
Director of Development Services

cc Mayor and City Council  
Robert C. Dunek, City Manager  
Dave Simpson, OCCOG Executive Director



February 14, 2012

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

Transmitted via Email to [lieb@SCAG.ca.ca.gov](mailto:lieb@SCAG.ca.ca.gov)

Re: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR).

Dear Mr. Lieb:

The City of Glendale respectfully submits the following comments on the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR).

1. Under the Transit and Rail policies the RTP encourages local transit operators to expand and provide connections to planned rail and regional transit services as well as the major employment centers. While the City of Glendale supports such a policy, the plan fails to recognize the additional funding that will be necessary to fund such services by local agencies. Local transit operators currently provide key connection to the existing commuter rail, light rail, and BRT services using local transit funds. Any further expansion of these services although important in improving mobility, will create a hardship on local agencies.
2. Under Los Angeles Metro's 2009 Long Range Plan, the following projects were included as "Strategic Unfunded Projects":
  - a. Extension of the Orange line and Red Line to Bob Hope Airport.
  - b. East-West Connector between North Hollywood Red Line/Orange Line and the Pasadena Gold Line via Burbank and Glendale to provide a "missing link" between San Fernando Valley and San Gabriel valley.
  - c. Burbank – Glendale Light rail to Union Station or expansion/enhancement of the Metrolink service.

The above key transit projects should also be considered for implementation by using the "reasonably-available" revenues similar to RTP Financially Constrained Plan.

3. The California High Speed Rail (CHSR) in the RTP is included as currently being planned. However, the RTP fails to again address the impact of such a system on the local transit system such as the Beeline Service and the lack of funding for service connections to the High Speed Rail stations. Considering the tremendous capital and operating cost of the CHSR, we recommend implementation of alternatives such as increasing interregional connectivity of the existing systems (commuter rail, light rail and bus rapid transit) to improve mobility in the sub-regions at a lower cost and more immediate before the CHSR is constructed.
4. The RTP only allocates a little more than 1% of the funding to Active Transportation. We believe that that SCAG should consider increasing the funding for Active Transportation to between 5%-8% of the total funding in the RTP.

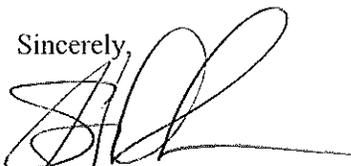
5. The 2012 RTP Financial Plan assumes that the “core revenues” and the “reasonably- available revenues” will fund the RTP’s Financially Constrained Plan. The following are key issues that need to be addressed in the Financial Plan:
  - a. As stated above, there are no provisions for funding local transit services as a result of planned expansion of rail and commuter services.
  - b. The “reasonably-available revenues” category in the amount of 226 billion dollars is in our opinion optimistic as to the possible adjustment to state and federal gas taxes, revenues from TOLL roads, and freight fees. There are no details about the controversial “vehicle mile user fees” that regional and local agencies have to enact to raise funding.
  - c. Highway projects are front loaded as they are easiest to finance in comparison to transit projects by borrowing against future toll revenues. Highway project increase in Vehicle Miles Traveled (VMT) consequently raises compliance issues with SB375 to reduce greenhouse gas emissions. It is our recommendation that transit (bus and rail), bicycle and pedestrian projects take priority over highway projects as they can improve mobility and reduce emissions as well.
  - d. It is recommended that the RTP/SCS Financial Plan include a full benefit/cost ration analysis and a Performance Criteria for major highway and rail projects contained in the “Constrained Financial” Plan.

Overall, we are concerned that the RTP’s assumption regarding the “reasonably- available revenues” is optimistic and the PEIR should consider alternatives in the draft plan that identifies only projects that can be funded as part of the “core revenues” to make the plan more realistic with priority given to transit projects.

Lastly, as cited on p. 3.12-25 of the DEIR , “Locally-developed county transportation plans have identified projects to close these (highway network) gaps and complete the system , and they are included in the Plan .These projects include ...the SR710 Gap Closure in Los Angeles County...”. The position of the City of Glendale remains consistent with Resolution No. 09-111 approved by the Glendale City Council on July 28, 2009, which addresses both the tunnel “gap closure” alternative as well as the general subject of “gap closure” alternatives for the SR-710 freeway between the I-10 and SR-134/I-210 freeways. On behalf of City Council and the citizens of Glendale, I wish to reiterate our opposition to any “gap closure” alternative that has or could be developed. In addition, I wish to express our opposition to the continued effort and expenditure of tax-payer monies in exploring, studying, and developing any means to facilitate this “gap closure”. It is Glendale’s belief and desire that efforts instead be directed to the development of alternatives that more effectively and more thoroughly address the concerns of mobility, congestion, and the movement of goods in the SR-710 corridor, particularly from our ports. Such alternatives should expand mass transit systems, improve existing infrastructure, and limit the long-distance movement of cargo/freight from the ports to rail. The City of Glendale has opposed this project and recommends the development of a multi-modal solution in lieu of further consideration of this project.

The City of Glendale looks forward to working with SCAG to address issues listed above. We appreciate the opportunity to comment on the RTP/SCS and the PEIR.

Sincerely,



Scott Ochoa  
City Manager



# City of San Clemente City Manager

George Scarborough, City Manager  
Phone: (949) 361-8322 Fax: (949) 361-8283  
scarboroughg@san-clemente.org

February 14, 2012

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

Subject: Comments on Draft 2012 SCAG RTP/SCS/PEIR

Dear Mr. Ikhata,

Thank you for the opportunity to provide comments on the Draft 2012 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Draft Program Environmental Impact Report (DPEIR) for the 2012 SCAG RTP/SCS. The City of San Clemente requests a response to the following comments:

### **The City concurs with OCCOG and OCTA comments**

The City of San Clemente concurs with the comments SCAG will receive from the Orange County Council of Governments (OCCOG) and Orange County Transportation Authority (OCTA). The City requests SCAG to respond all of their comments and to act upon any changes advocated by these agencies, of which the City is a member agency.

### **The General Plan and Zoning maps for the City are not accurate.**

SCAG's website allows member agencies to review the maps that would be used for the Draft RTP/SCS and PEIR. We reviewed the latest map files and concluded they are not accurate. The City worked closely with SCAG staff on several occasions to ensure SCAG has accurate maps for the City of San Clemente. Please update the map files to reflect the comments we previously provided.

**Growth forecast numbers should be at the county level consistent with previous RTPs.**

The 2012 RTP-SCS, like other planning documents, has been written based on assumptions, market conditions, forecasts, projects lists, budgets, datasets, public opinion, and other information that can change after the 2012 RTP-SCS is adopted. Therefore, it is important for the 2012 RTP-SCS to project growth at the county level so cities and counties have the flexibility to respond to these changes when future land use decisions are made. If smaller geographic levels are used (e.g. subregions, cities, census tracts, Transportation Analysis Zones, parcels, or grid cells), it is less likely the 2012 RTP/SCS will forecast actual growth patterns. Therefore, please keep all growth forecast numbers at the county level. This has been the precedent for previous RTPs.

**OCP-2010 modified numbers should be used**

On January 26, 2012, the OCCOG Board of Directors approved an updated version of the OCP-2010 dataset for use in the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The updated OCP-2010 dataset was provided to SCAG staff in December 2011. The City requests for all 2012 Draft RTP/SCS/PEIR documents, tables, maps, narratives, modeling runs, PEIR alternatives (including Alternate C/3/Envision 2), and datasets to be updated with the latest OCP-2010 numbers per the OCTA/OCCOG/SCAG Memorandum of Understanding (MOU) that established Orange County's subregional delegation.

**The OC SCS should be fully integrated into the regional RTP/SCS**

The RTP and appendices include numerous references to the OC SCS and SCAG's total use of the document. Yet numerous other references suggest SCAG may have modified elements of the OC SCS data. SCAG should include a statement, maps, tables, charts, and other information that is necessary to confirm all of the OC SCS land use, socioeconomic and transportation data was incorporated into the regional RTP/SCS without changes. SCAG staff told the OCCOG Board (at several meetings) the OC SCS data has not been and will not be altered. The OC SCS is to be integrated into the regional SCS without changes per the Memorandum of Understanding (MOU) between OCCOG and SCAG.

**Mileage-based user fee**

The draft RTP suggests \$127.2 billion of the approximately \$219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a \$0.15 gas tax increase between 2017 and 2024. After that, the draft RTP assumes the state or federal government would either replace the gas tax with an indexed mileage-based user fee of \$0.05 per mile, beginning in 2025, or further increase fuel taxes to

generate revenues equivalent to the mileage-based user fee. The City of San Clemente cannot support an increase in fees, including the introduction of a mileage-based user fee, until further economic analysis is completed and presented to the City for discussion. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on the need for a return-to-source criteria, as well as a process for recognizing and rewarding areas which commit additional local revenues.

#### **Draft Program Environmental Impact Report**

- The Draft PEIR states that SCAG "has made a preliminary determination that the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that local governments will actually implement them." It is unclear how this determination was made. Was this studied? If so, please provide the analysis that was used to prove cities and counties have the ability, staffing, and financial resources to implement all of the mitigation measures.
- At the January 26, 2012 SCAG workshop, and at other meetings, SCAG explained that **"This PEIR offers a "toolbox" of mitigation measures** for future project-level environmental analyses." . . . It also includes suggested mitigation measures for local agencies to consider for implementation, if appropriate and feasible." The PEIR contains text that contradicts this. The document states local agencies *"can and should"* implement the mitigation measures SCAG proposes. The use of the words *"can and should"* implies local agencies have the feasibility and obligation to implement the mitigation measures. SB 375 is not to supersede local agencies' authority to regulate land uses. California Government Code section 65080(b)(2)(K) states ". . . Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region. . ." To address these inconsistencies, the "can and should" language should be changed in mitigation measures to read "~~can and~~ should consider where applicable and feasible" when local and regional agencies, other than SCAG, are identified. This will clarify SCAG's intent to make the mitigation measures a menu of options for local agencies to use when land use decisions are made on projects.
- Several of the mitigation measures that identify SCAG as the acting agency propose measures that appear to exceed the authority of SCAG.
- SCAG must be mindful and use great discretion when making commitments and/or suggesting policies and strategies that may impact and encroach upon local and county agencies' responsibilities. Any such changes should be evaluated and supported by local agencies. Commitments should not be made on behalf of local agencies without the consent of City Councils and County Supervisors.

- Several mitigation measures indicate that local jurisdictions or other entities should implement new fees or propose taxes to pay for a variety of programs or for acquisition of land for preservation. Increases to fees or taxes are issues that could require voter approval and, thus not be approved. They also represent prescriptive means to accomplish the mitigation. It is requested that such measures be reworded to indicate that a new or increased fee, new tax, or other increase is only an option as a way to implement the mitigation. Also, please clarify whether it was assumed that these additional fees were considered feasible and if the new fees that are suggested were considered in the financial plan or economic analysis of the RTP.

**Indicate local jurisdictions are not required to demonstrate compliance with the PEIR.**

Please amend the text on page 1-5 of the draft PEIR to indicate that local jurisdictions are not required to demonstrate compliance with the PEIR. The document currently reads: "Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process."

The City of San Clemente appreciates SCAG's work on the RTP and PEIR. Again, thank you for the opportunity to comment on the planning documents. We look forward to the adoption of a complete and accurate 2012 RTP and PEIR in April. If you have further questions, please contact Jim Pechous at (949) 361-6195.

Sincerely,

George Scarborough  
City Manager

cc: City Council  
CDD (Jim Holloway, Jim Pechous, Jeff Hook, Christopher Wright)  
Margaret Lin, SCAG  
Dave Simpson, OCCOG  
Marika Modugno, OCCOG TAC Chair



*Mayor*

L. Anthony Beall

*Mayor Pro  
Tempore*

Steven Baric

***Council Members***

Carol Gamble

Jerry Holloway

Jesse Petrilla

*City Manager*

Steven E. Hayman

February 9, 2012

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

**Subject: Comments on the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and Program Environmental Impact Report (PEIR)**

Dear Mr. Ikhata:

The City of Rancho Santa Margarita appreciates the opportunity to review and provide comments on the draft 2012 RTP/SCS and the PEIR. The City has completed its review of these documents and provides the following general comments:

- **Concern with the timeline.** We recognize the immense efforts it took to prepare these documents. They are incredibly complex documents establishing important and far-reaching policy for the region. However, because of this importance and complexity, we would like to express concern about the timing of the release of the documents and hope that preparation of future RTP/SCS documents will take into account the need to accommodate adequate review, discussion and revision time for all of the documents. The timeline of document releases, public comment period, and time allowed for the response to comments results in an inability to have credible discussion regarding possible changes because the timeline does not allow for recirculation or full discussion of requested changes. The documents were released over the holiday season and included the release of draft PEIR document on December 30, 2011. The minimum 45-day public comment period closes on February 14, 2012. Only a few weeks are provided to prepare responses to comments and amend the documents to ensure that the Regional Council may consider the certification of the PEIR and the approval of the draft RTP/SCS on April 4, 2012.



- **It is requested that the adoption of the growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs.** Planning documents need to be flexible. As time passes, what is possible and feasible for any given project changes. These changes can be due to market conditions, new information or data, or infrastructure available that may shift when and where development is possible. Smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell would limit jurisdictional control over land use.
  
- **Please define what is meant by various terms in the RTP/SCS and draft PEIR.** Because mitigation measures are intended to be implementable and measurable in order to evaluate the effectiveness of the measures, it is important for the measures to clearly indicate what actions are expected to be undertaken. These include, but are not limited to:
  - Urban Growth Boundary
  - Parking Cash Out
  - References to benchmarks
  - Smart growth principles
  - SCRIP
  - Active Transportation
  - Gentrification
  - Greenfield
  - Open space
  
- The OCCOG Board approved the update to the OCP-2010 dataset used in the OC SCS. OCP-2010 Modified was officially approved by the OCCOG Board on January 26, 2012 and is a data amendment to the OC SCS. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was provided to SCAG staff in December 2011 and this is the formal notice of the update which should be incorporated into the 2012 RTP/SCS, PEIR, and related documents. To be consistent with the MOU on subregional delegation between OCTA, OCCOG, and SCAG, all documents, tables, maps, narratives, modeling runs, PEIR



alternatives (including Alternate C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.

- Finally, the City has participated in providing comments through the OCCOG Technical Advisory Committee (TAC). Rather than incorporating those comments into this comment letter verbatim, the City requests that the comments provided by the OCCOG TAC be incorporated into the City's comments by reference.

The City plans to continue its active participation in the 2012 RTP/SCS approval process through OCCOG TAC; however, the City requests that SCAG continue to provide the City with any additional information on the project as it becomes available. Should you have any questions, please call me at (949) 635-1800 x6704.

Sincerely,

A handwritten signature in black ink, appearing to read "Nate Farnsworth", with a long horizontal flourish extending to the right.

Nate Farnsworth  
Senior Planner, AICP

cc: Steven E. Hayman, City Manager  
Kathleen Haton, Development Services Director  
E. Max Maximous, City Engineer  
Jacob Lieb, SCAG  
Peter Herzog, OCCOG Board of Directors Chair  
Dave Simpson, Executive Director for OCCOG



# RIVERSIDE COUNTY PLANNING DEPARTMENT

*Carolyn Syms Luna*  
*Director*

February 14, 2012

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

**RE: Southern California Association of Governments (SCAG) – Draft Regional Transportation Plan/Sustainable Communities Strategy 2012-2035 (RTP/SCS 2012) and Draft Program Environmental Impact Report (PEIR) (SCH# 2011051018)**

The County of Riverside Planning Department (“Planning Department”) appreciates the opportunity to comment on the draft 2012 RTP/SCS and the associated draft PEIR. The Planning Department supports the approach of resolving future challenges based on the economy, transportation, and land use. We recognize and understand the challenges that the region has been facing and will continue to face in regard to growth and development.

SCAG is already home to 18 million people, and it is anticipated that the region will add 4 million people by 2035. From the County’s perspective, it is important to note that the trend of such tremendous growth did not and will not occur evenly across the SCAG region. Much of the recent growth has occurred and projected growth will occur within the Inland Empire area, especially in Riverside County. According to the latest census, Riverside County was the fastest growing county in California between 2000 and 2010 both in absolute numbers (644,254) and in percentages (41.7%). This accounts for almost 20 percent of total growth in California. Similarly, over 20 percent of the regions household growth between 2014 and 2021 is projected to occur in Riverside County.

Nevertheless, many of the strategies and mitigation measures identified in the plan as well as in the PEIR should be refined to meet the individual needs of the counties within the SCAG region and account for the growth trends of the region. Because SCAG is a regional entity, Riverside County understands the difficulty of tailoring the proposed mitigations and policies to be specific to certain geographic locations, but having many blanket implementation measures without consideration of each local jurisdiction also leaves the assurance of the document implementation to be much desired when feasibility is concerned.

The Planning Department has the following comments:

## **1. Land Use**

One of the biggest changes in the RTP/SCS 2012 is its emphasis on higher density residential development and its concentration within the High Quality Transit Areas (HQTA) to accommodate the changing demand in types of housing. To a certain extent, this is true on a regional level; however, the trend is not necessarily mutual when each area is separated out of the SCAG region. Inland counties

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still see the demand for single family housing, and when the economy rebounds, the County of Riverside still plans on managing the growth of the single family housing market through its General Plan. SCAG should address the fact that growth is still occurring in the Inland counties as evidenced by the recent census. Table 4, 8, 10, and 11 of the RTP Growth Forecast shows the past, current and forecasted trends for each county in the region.

Example: Riverside County's share of regional population in 1990 was 8%, in 2000 it grew to be 9.4%, and then 12.1% in 2010. Even with SCAG assumptions shown in Table 8 of the Growth Forecast, the share of the population for Riverside County grows to 15% by 2035 equaling that of Orange County. In contrast, the share of population in Los Angeles County diminishes to 51% from 54% and employment to 51% from 57% by 2035. Riverside County would like to compare the projection numbers of 2020 and 2035 with SCAG's growth forecasts. Riverside County population projections of 2010 is 2,153,189 and 2035 is 3,396,287.

Using the example above, an inferred conclusion can be made that SCAG's HQTAs designations for 2035 (Exhibit 4.13 to 4.19) do not accurately reflect the population and employment trends shown in Table 8. It appears that HQTAs were designated based on existing Transit or Transportation corridors without considering the actual existing and proposed population centers of each jurisdiction in Riverside County. When HQTAs are compared together amongst all six counties, as in Exhibit 4.13, the share of HQTAs clearly do not show the 15% population share that Riverside County represents in 2035. Also, questions can be raised as to why Riverside County HQTAs do not connect to any of the surrounding counties such as San Diego County.

In addition, when city boundaries are overlaid on top of Exhibit 4.18 (see handout 1), the unincorporated section of the County contains only one corridor with an HQTAs on I-15 in Temescal Canyon. Currently, the unincorporated County has 355,718 people (excluding Jurupa Valley and Eastvale) and expects a population growth of 704,253 people by 2035, almost doubling the current number. Considering the County forecast and the historical growth trend of Riverside County, SCAG's placements of HQTAs become more questionable. How was SCAG able to redistribute 51 percent of the new residential growth in the unincorporated Riverside County? From Riverside County's perspective, the placements of the HQTAs are perceived to just be relocation of growth rather than managing growth. Riverside County would benefit greatly if the details of the land use and projection data analysis were shared with the local jurisdictions. Currently, based on the plan and the PEIR, the land use analysis and local inputs on the data incorporations are not clearly outlined.

Example: PEIR 2.25 states, "The SCS focuses the majority of new housing and job growth in High Quality Transit Areas (HQTAs) and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an **improved jobs-housing balance and more opportunity for TOD.**" Again, looking at the HQTAs on a macro level, the jobs-housing balance goal may have been achieved based on the provided locations of the HQTAs, but if the HQTAs are separated out by counties, jobs-housing balance cannot be achieved in the Inland Empire region. As stated, "The 2012-2035 RTP/SCS assumes that **51 percent** of new housing developed between 2008 and 2035 will be within HQTAs, along with 53 percent

of new employment growth (compared with 39 and 48 percent, respectively in 2008).” (PEIR p.2-31). As indicated above, if most of the growth is still projected to occur in the Inland Empire region, achieving the goal of locating 51 percent of the new growths in the limited HQTAs in the Inland Empire is not feasible. Creating more urban centers within suburban counties achieve far greater jobs-housing balance than having the employment concentration heavily depend on Orange and Los Angeles Counties.

## **2. Public Outreach and Data Usage (Land Use and Projections)**

Both of the SCAG documents have stated that the outreach efforts have allowed the organization to collect land use data from the local jurisdictions in developing the SCS, especially in Orange County and Los Angeles County (Gateway Cities COG). Riverside County also appreciates many opportunities and discussions on various levels of data sharing with SCAG. In the past, Riverside County has provided SCAG with General Plan Land Use data, Demographics/Socioeconomic data, and Growth Projections data with maps and comment letters on a TAZ level basis. All of these great efforts cannot be recognized if SCAG does not detail how they have incorporated the local jurisdiction inputs into the RTP/SCS and PEIR. Some projection data from SCAG was shared, but the discrepancies between SCAG and Riverside County data was not explained. (see attachment)

Example: SCAG RTP/SCS and PEIR state, “SCAG shall encourage cities and counties in the region to provide SCAG with electronic versions of their most recent general plan (and associated environmental document) and any updates as they are produced” (MM-LU1), and “...Lead and responsible agencies can and should then make any necessary adjustments to the applicable General Plan. Any such identified adjustment shall be communicated to SCAG” (MM-PS11 and PS56). “As a result of this comprehensive and integrated approach, the transportation projects and strategies included in the 2012-2035 RTP/SCS are generally consistent with the county and regional level general plan data available to SCAG.” (PEIR 3.8-13) SCAG should work with local jurisdictions to explain how the data provided by various agencies were used in the RTP/SCS, and SCAG also should ask local jurisdictions for interpretation of the provided land use data.

## **3. Greenhouse Gas (GHG)**

In light of recent updates and litigations on the GHG topic, it is a challenge to provide definitive comments. However, one comment is on the analysis conducted by SCAG (Calthorpe) on a per capita basis to meet the less than significant threshold outlined by the SB375. As the PEIR states in p.3.6-19, “...the Plan alone is not intended to meet the AB32 target. By meeting the SB375 targets, the Plan has successfully contributed its share of meeting the objectives of AB32”. SCAG’s PEIR does not quantify or attempt to meet the AB32 Scoping Plan challenges that most of the local jurisdictions face with their General Plan update processes and development of Climate Action Plans (CAP). Although SCAG correctly concludes Impacts 3.6-1 and 3.6-2 to be significant and unavoidable, as the regional MPO, more efforts should have been made to address the GHG issues outlined in AB32 Scoping Plan through quantifications to assist the local jurisdictions who are struggling with AB32 compliance.

#### **4. Use of Words “should and can” in the PEIR**

The PEIR of the RTP/SCS mitigation measures contain the phrase “...should and can...”. Such terms are not typically used in EIR documents to implement mitigation measures, especially when the measures are directed at another project proponents like the local jurisdictions. SCAG should provide more accurate information on the intent of the phrase “...should and can...” usage as well as obtaining opinion on its legal meaning. Currently, as it stands, it is perceived to convey a message that local jurisdictions are able to deliver on the implementation of the measures and that it must be completed as noted in the PEIR.

Example: RTP p.81 “Encourage cities and counties to update their general plans and provide the most recent plans to SCAG” vs. PEIR p.ES-37 “**MM-LU16:** Local jurisdictions can and should seek funding to prepare specific plans and related environmental documents to facilitate mixed-use development at selected sites, and to allow these areas to serve as receiver sites for transfer of development rights away from environmentally sensitive lands and rural areas outside established urban growth boundaries.”

In MM-LU16, SCAG does not have the enforcement ability to direct local jurisdictions to seek funding for mixed-use planning and development, especially when the measure is directing the implementing agencies to implement a planning concept that is exceptionally difficult to implement in areas such as Riverside County. (“transfer of development rights” (TDRs) and “urban growth boundaries”) Measures identified in the PEIR must be appropriate, feasible, enforceable, and implementable by the suggested responsible agencies. It is recommended that the words “...should and can...” be replaced with language that suggests that the mitigation measures should be considered where appropriate and possible. If this language is not changed, then it is suggested that SCAG seek legal opinion on whether effected entities are legally obligated to implement the mitigation measures.

#### **5. Geographic Feasibility**

While producing the RTP/SCS and PEIR is a massive effort due to the sheer size of the region that SCAG covers (38,000 sq. mi.), some geographically specific details should be available to the local jurisdictions that it impacts. In fact, because of the size and diversity of the region, SCAG should detail some aspects of the plan, analysis, and mitigation measures to target specific locations. It is correct that CEQA Guidelines 15152(c) does state that lead agency can defer the project-specific CEQA analysis for large plans like General Plans and RTPs (PEIR p.1-2); however, some sub-regional categorical analysis and mitigation measures are clearly necessary due to the “very complicated and highly diverse” nature of the region. (PEIR p.1-2) SCAG, as a regional entity, should not be oversimplifying the plan that leaves the local implementing agencies questioning details.

#### **6. Growth Forecast**

Growth forecasts at the jurisdictional level were approved by the Riverside County Board of Supervisors, the CVAG and WRCOG Executive Committees and were transmitted to SCAG in 2010. Subsequent to these policy level actions, County staff provided SCAG staff detailed growth forecast at the TAZ level. WRCOG did approve revised forecasts for the jurisdictions within its subregion and

SCAG staff did adjust the forecasts for the Cities of Hemet, Menifee, and San Jacinto. The growth distribution of households and employment utilized in the RTP/SCS are not consistent with the TAZ level data provided to SCAG staff. It is therefore recommended that the growth forecasts are not approved at the TAZ level. It is further recommended that no findings of consistency and conformity, recommendations on the placement of infrastructure, or recommended funding be based on the TAZ level forecast used in the RTP/SCS plan. From the perspective of local jurisdiction, it is alarming and disconcerting to find that the data provided to SCAG can be modified without adequate methodologies or explanations.

## 7. Financial Plans

“One of the most critical elements of the RTP/SCS is the financial plan. The RTP is required to be financially constrained, meaning that project costs must be matched with “reasonably available” revenues.” Riverside County agrees with other COG comments on the Financial Plans of the RTP/SCS. There are some innovative funding mechanisms identified in the plan (Table 3.3 and 3.4.4), however, once again, the feasibility of the revenue identified in the RTP is questionable. In fact, it is very unlikely that much of the new supplemental revenues identified in the plan will materialize. There are no other alternatives identified in the plan that would replace or augment the loss in revenue if the new funding measures fail. Implementation measures on the funding items should be more clearly outlined and planned for the local jurisdictions.

Examples: 15c per gallon in addition to 18c per gallon current California State gas tax is almost doubling the tax rate. A mileage-based user fees are also identified in the plan that estimates about 5c per mile starting 2025 replacing current gas tax. In addition, the plan identifies E-Commerce Tax, Highway Tolls, and Special Districts.

## 8. Minor Edits:

a. RTP p.54: Complete Streets Discussion: “Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network.” Riverside County continuously implements and updates its own trails network to create connectivity and accessibility. We would like to find out how SCAG’s *Exhibit 2.5 Regional Bicycle Network* was developed before relying on the map provided in the regional plan. Such process should be a “bottom-up” process and not a “top-down” approach.

b. Mitigation measures in the PEIR should not reiterate current existing laws or regulations. Already mandated items cannot be used to further mitigate an impact. e.g. “**MM-CUL5:** As part of the appropriate project/environmental review of individual projects, project sponsors can and should consult with the Native American Heritage Commission (NAHC) to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.” “**MM-HM11:** If asbestos-containing materials (ACM) are found to be present in building materials to be removed project sponsors can and should submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and

regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health & Safety Code Section 25915-25919.7; and other local regulations as applicable.” “**MM-TR89: Vehicle Idling: Local jurisdictions can and should enforce State idling laws for commercial vehicles, including delivery and construction vehicles.**”

c. *PEIR 3.6 Greenhouse Gas Emissions* (p.3.6-7): “Green Riverside, Green Action Plan” is a plan within the City of Riverside and is not related to what the County is doing on GHG topic. Riverside County is in the process of developing its Climate Action Plan (CAP) and has finished the initial greenhouse gas inventory. Accordingly, County has finished the draft update of the Air Quality Element with draft implementation measures.

d. *PEIR 2.0 Project Description* (p.2-3): Table 2-1 should be showing 2035 projections for population, households, and employment in relation to “project” and “no project”, but the actual numbers are identical. It looks like a table formatting mistake.

The Planning Department formally request, pursuant to Public Resources Code Section 21092.5, to continue to be notified and be involved in the CEQA review process of the above referenced project until the adoption of the Final EIR. Further, Riverside County staff is available to work with SCAG to address issues and questions outlined in the comment letter. If you have any questions, please contact Josh Lee at **951-955-6864** or via email at [jlee@rctlma.org](mailto:jlee@rctlma.org).

Sincerely,

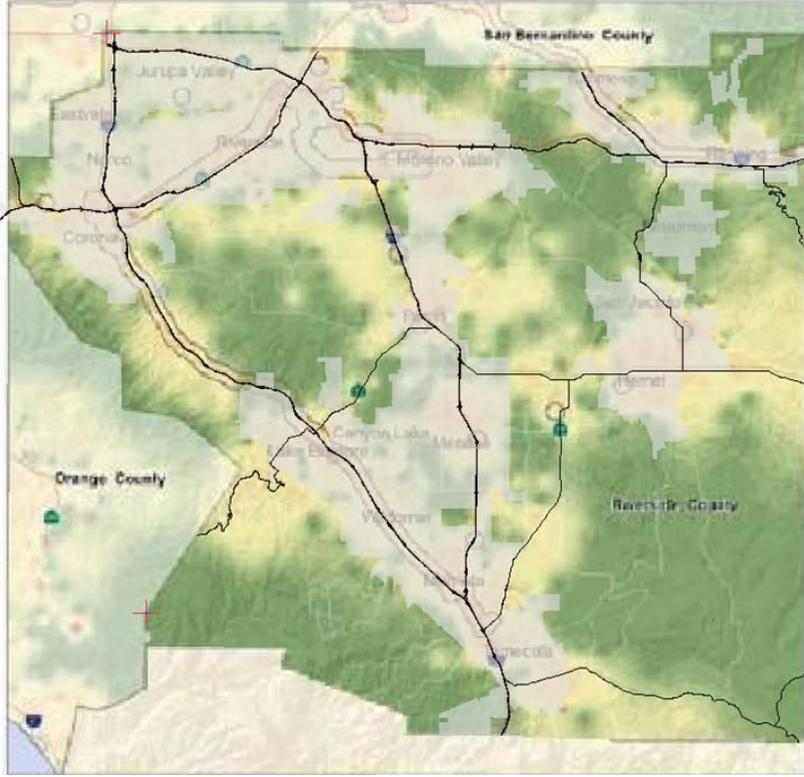
RIVERSIDE COUNTY PLANNING DEPARTMENT  
Carolyn Syms Luna, Director

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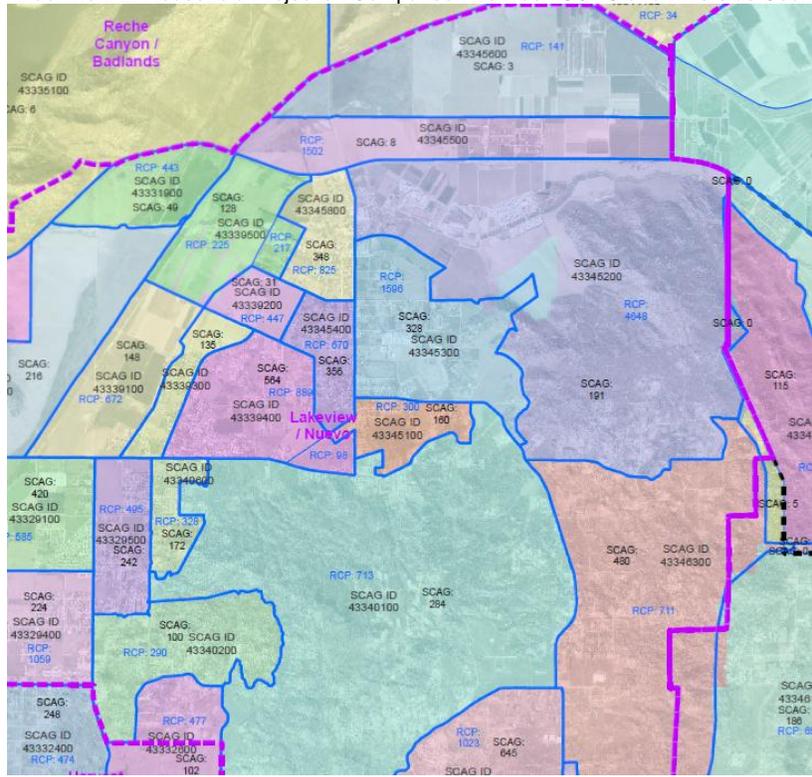
Lee, Josh – Urban Regional Planner IV

cc: George Johnson, Director, Transportation and Land Management Agency  
Carolyn Syms Luna, Director, Planning Department  
Juan Perez, Director, Transportation Department  
Frank Coyle, Deputy Director, Planning Department  
Tom Mullen II, Deputy Director, Transportation and Land Management Agency  
Mitra Mehta-Cooper, Principal Planner, Planning Department  
Bill Gayk, Consultant, Planning Department

Attachment 1: Riverside County Cities in Relation to SCAG HQTAs Placements



Attachment 2: Household Projection Comparison Between SCAG and Riverside County: Lakeview/Nuevo







# San Gabriel Valley Council of Governments

1000 S. Fremont Ave., Unit 42, Alhambra, CA 91803 Phone: (626) 457-1800 FAX: (626) 457-1285 E-Mail [SGV@sgvcog.org](mailto:SGV@sgvcog.org)

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*Fifth District, LA County*  
*Unincorporated Communities*

*SGV Water Districts*

February 23, 2011

Hasan Ikhata  
Southern California Association of Governments  
818 W. Seventh Street, 12th Floor  
Los Angeles, CA 90017-3435

## **RE: SCAG's Draft 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)**

Dear Mr. Ikhata,

At its Governing Board meeting on February 16th, the San Gabriel Valley Council of Governments (SGVCOG) Governing Board adopted a position of "support" for the above mentioned alternative for the SCAG Draft 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS).

The draft RTP/SCS includes four alternatives. The San Gabriel Valley Council of Governments supports Alternative B as this Alternative best addresses future transportation needs and anticipated changes associated with future growth.

Should you have any questions, please contact Nicholas Conway at (626) 457-1800.

Thank you for your consideration.

Sincerely,

Angel Carrillo  
President



*Fostering the success of business to enrich the quality of life in the greater San Gabriel Valley*

## **San Gabriel Valley Economic Partnership Regional Transportation Plan Comments**

December 1, 2011

SGVEP applauds the ongoing leadership of the Southern California Association of Governments and the Regional Transportation Plan.

The San Gabriel Valley Economic Partnership would like to make the following comments on the Draft RTP Alternative B.

- The Partnership supports the Gold Line Foothill Extension the Montclair as a part of the RTP constrained plan.
- The Partnership supports the completion of the Alameda Corridor East in the constrained plan.
- America Fast Forward (30/10 initiative) addresses the need for improving the Los Angeles County transportation infrastructure quickly. Specifically, projects that the Partnership continues to support that are included in the 30/10 initiative are the Goldline Eastside Extension SR 60 alignment as well as the Goldline Foothill Extension, and the Regional Connector. We support leveraging the voter approved Measure R funds to complete the above projects in an expedited manner.
- Adding express bus service as a part of the proposed High Occupancy Toll Lanes network is imperative if the project is to be successful. Additionally, we ask SCAG to evaluate the Metro Express Lanes Project before committing to a regional High Occupancy Toll network.
- Addressing increased east west truck traffic in the San Gabriel is important. However, the East West Freight Corridor proposed in the RPT has not had sufficient public input. Many of our member cities are opposed to the project as they understand it today. We ask that SCAG take the time necessary to consult with the community before moving forward.
- The Partnership recognizes that declining gas tax will impact the maintenance of our highway system unless alternative revenue sources are available. We support studying evaluating other revenue options including one based on vehicle miles traveled to replace gas tax. However, we are aware that other agencies are evaluating new transportation fees as well such as the traffic mitigation fee proposed by METRO.



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During these difficult economic times, any new tax or fee could result in additional job loss. Economic impacts need to be considered before asking voters for any additional transportation funding.

- The Partnership supports SCAG evaluating the impact of using funds earmarked for High Speed Rail to improve the current regional Metrolink service.
- Highway 71 in Pomona is a bottle neck point in the San Gabriel Valley. The Partnership supports SCAG in their plan to change the highway from an expressway to a full freeway between I-10 and SR-60 with the addition of 1 mixed flow lane and 1 HOV lane in each direction as part of the constrained plan.
- The Partnership recommends the RTP include carpool lanes on the I-10 Freeway from Route 57 to downtown Los Angeles.