March 6, 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 Alliance for a Healthy Orange County, 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 Alliance for a Healthy Orange County is a county-wide collaborative of health care organizations, community-based organizations and universities whose mission is to champion policy strategies and leverage funding opportunities that result in enhanced health outcomes and reduced health disparities for Orange County residents.

The Alliance urges SCAG to consider the important health impacts of the RTP and place increased emphasis on projects that will promote active transportation. The region does not need a plan that allocates $22 billion on road widening and only $6 billion on active transportation. It is critical to change funding allocations to improve safety and public health throughout our region.

We request 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.
2. Prioritize active transportation funding and distribute these funds evenly over the 25 year period of the plan so that the benefits of active transportation are brought to Orange County sooner.
3. Incorporate the development of an Active Transportation Finance Strategic Plan by 2014 that identifies how each CTC is spending funds and the opportunities available to increase funding for active transportation.
4. Allocate funding for bicycle and pedestrian planning and usage counts.
5. Set aside funding in the RTP to support SCAG cities in developing bicycle and pedestrian master plans, safe route to school pans and ADA transition plans. Establish a goal that 50% of SCAG cities shall develop these plans by 2016.

Alliance for a Healthy Orange County is a fiscal sponsorship project of the One OC and funded by the Health Funders Partnership of Orange County and the California Endowment

6. Adopt a Regional Complete Streets Plan by 2014: This plan will incorporate input from local jurisdictions to prioritize complete streets projects in programming efforts and dedicate a portion of system preservation and maintenance funding for improving the road conditions of all users.

7. Adopt Safe Routes to School Regional Strategic Plan by 2014.

8. School Siting and Joint Use Policies should be incorporated as land use elements of the SCS.

9. 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.

10. Monitoring detailed population data and metrics in environmental justice communities.
The lack of active transportation funding disproportionally 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.

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,

Barry Ross

Barry Ross
Chairman

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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 1st-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,

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Board of Directors & Volunteer
American Heart Association

Bonnie Holmes Gen
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American Lung Association in California

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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.[1, 2] 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.[3] Increasingly distracted drivers are more likely to kill pedestrians and bicyclists, with more adverse impacts on TDM and safety.[4]
- Pedestrians and bicyclists are distracted reading their digital device and oblivious to outside sounds wearing earphones.[5]
- 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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[1] 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.

[2] 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/

[3] Associated Press, December 17 & 18, 2011 based on NHTSA campaign http://distraction.gov/

[4] 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.

[5] 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%.[6] 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.[7]

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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[6] The December 2011 draft 2012-2035 Plan, page 2.

[7] 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.[8] 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.[9] Digital systems would save drivers and businesses about $240 billion on insurance premiums over the twenty years between 2015 and 2035.[10] 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.[11] The insurance and time savings more than justify the increased gas tax[12] and mileage-based user fee suggested in Table 2 with directly offsetting savings for drivers and business.[13]

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[8] An estimate based on proportionality of population SCAG may want to verify.

[9] 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.

[10] 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.

[11] 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.

[12] 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 1/20th the rate of a Smart Car, who would pay ¼ the rate of an SUV, who would pay 1/6th 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.

[13] 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.[14]
- 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.[15]
- 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.[16]
- More gamification[17] 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.[18]
- Cargo-pooling for mail, hardcopy messages, tools, equipment, food, etc.[19]

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[14] (We may find excess parking spaces to convert into mini-parks or weekly/seasonal business locations.)

[15] (Bicycle on the right! *Spanish translations welcome.* Stop for red light! Cross curbs at right angles.)

[16] The perception of safety in small vehicles allows the proliferation of Smart Car sized vehicles and even freeway capable human-electric hybrids.

[17] 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_lnk1%7C125198.

[18] 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/.

[19] 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[20] 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. This app can work on any smart phone.

Cellphone-parking[21] 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[22] 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[23] 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.

[20] 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.
[21] 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.
[22] http://www.communityenvironmentalcouncil.org/Programs/EP/PDFs/Transportation_Nov08/CEC_transportation_Nov08_final.pdf
[23] 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.

<u>Smart phone-transit & Smart phone-parking</u>

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.[24] 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[3].

[24] 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 then 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[25] 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.[26]

[25] One of many possible descriptions: http://www.rescuecom.com/blog/index.php/computer-support/flight-made-cool-and-safe-ads-b-is-coming/
[26] 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.[27] 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^+ 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.

[27] 2005 quote no longer available, low cost can be inferred from the Vehicle-to-Vehicle portion of http://www.traffictechnologytoday.com/opinion.php?BlogID=45

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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

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

Arroyo Verdugo Cities

February 9, 2012

Mr. Jacob Lieb
Ms. Margaret Lin
Southern California Association of Governments
818 W. 7th Street, 12th 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 and 2012PEIR@scag.ca.gov) and via 1st 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.

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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

David A. Spence
Chair of the Arroyo Verdugo Steering Committee

c: Members of the Arroyo Verdugo Steering Committee

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February 13, 2012

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

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

Dear Mr. Ikhrata:

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

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 chose 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 (UBG) 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

Lacy Kelly
CEO, ACC-OC

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

February 9, 2012

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

Subject: 2012 RTP

Dear Mr. Ikhrata:

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

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.

Sincerely,

Steve Finnegan

Stephen Finnegan
Manager, Government Affairs and Public Policy

c: SCAG Regional Council

BROOKS STREET

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 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.

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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.[1] 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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[1] 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

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February 14, 2012

Mr. Jacob Lieb
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Re: Building Industry Association of Southern California, Inc.'s Comments on the Drafts of the 2012 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) and the Program Environmental Impact Report (PEIR)

Dear Mr. Lieb:

Building Industry Association of Southern California, Inc. (BIASC) is a regional trade association that represents more than 1,000 member companies. Together, BIASC's members build most of the homes and communities throughout the same six-county region in which Southern California Association of Governments (SCAG) is the metropolitan planning organization. Naturally, therefore, BIASC is profoundly interested in SCAG's role in land use regulations and all regional planning for development and redevelopment.

Given our strong interest in the subject, BIASC is grateful for this opportunity to provide comments concerning both (i) SCAG's Draft 2012 Regional Transportation Plan (RTP) – which includes an inaugural Sustainable Communities Strategy (SCS), and (ii) the draft of the Program Environmental Impact Report (PEIR), in which the environmental impacts of the 2012 RTP/SCS are discussed.

First, BIASC appreciates SCAG's staff's professionalism and extremely hard work up to this point. In 2008, when the California Legislature enacted Senate Bill 375 (SB 375) and thus mandated the creation of a regional land use plan, the Legislature assigned SCAG's staff daunting new challenges. Throughout SCAG's process of developing the SCS, BIASC has enjoyed a positive working relationship with SCAG's staff professionals; and we look forward to continuing that working relationship.

Second, BIASC brings to the SCS development process an ingrained, institutional philosophy about how land-use decision-making should be undertaken. We believe that sound land-use decisions are best made by the persons who best understand the local contexts in which development and redevelopment take place. Given our philosophical predisposition, BIASC has worried from the start that an SCS for SCAG's region, if not thoughtfully considered and fashioned, can harm our vitally important industry, our regional economy, and our society.

In addition, BIASC is well aware that attempts made elsewhere to adopt and implement "top-down" regional land-use strategies have fared quite poorly. For example, in July 2010, the British Government abolished its "regional spatial strategies" (RSS) law – six years after its enactment. In announcing the RSS law's abolishment, Britain's Planning Minister explained:

> "[T]hese controversial [regional spatial] strategies have proved that top-down targets do not build homes. All they have produced is the lowest peace time house building rates since 1924 and fuelled resentment in the planning process that has slowed everything down."[1]

Because of both (i) BIASC's longstanding preference for local land use decision-making, and (ii) our concerns about the consequences of an ill-conceived SCS, BIASC has participated very actively in the public processes that led up to the draft documents on which we now comment. BIASC's principles and preferences have been expressed many times to SCAG's staff, leaders, committees and regional council members in many forums. Notwithstanding our consistent participation and urging, however, we must now respectfully point out our remaining concerns about the Draft RTP/SCS and the Draft PEIR.

In terms of the sheer quantity of concerns, most of them relate to the Draft PEIR. BIASC's specific comments on the Draft PEIR are so numerous that a lengthy appendix accompanies this letter, in which our concerns are expressed in some detail. BIASC respectfully asks SCAG to respond, in accordance with CEQA and prior to consideration of the final PEIR for certification and approval by SCAG's Regional Council, to each issue presented in the appendix.

To briefly summarize BIASC's Draft PEIR concerns here, though, they are threefold. First, the Draft PEIR indicates that hundreds of specific mitigation measures would need to be analyzed and incorporated to the extent feasible in every future project throughout the SCAG region. Importantly, many of the listed mitigation measures were never before assembled for presumptive application to individual projects. Instead, many of them were drawn from "model policies" that were intended for consideration *only* at a jurisdictional planning level – *not* an individual project level. *See* Model Policies for Greenhouse Gases in General Plans, June 2009, at p. i (disclaimer), found at http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-ModelPolicies-6-12-09-915am.pdf and incorporated herein by reference.

Second, many of the mitigation measures set forth in the Draft PEIR have no relationship to the RTP/SCS or its impacts (e.g., mitigation measures ranging from low-flow toilets to green roofs). Other mitigation measures are quite far-fetched, such as the requirement to remove obstacles to "edible landscaping" at all projects throughout SCAG's six-county region.

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[1] See http://www.dlpconsultants.co.uk/pdfs/client_briefing/42%20Client%20Briefing%20Abolition%20of%20RSS%20&%20SoS%20Statement.pdf

Most worrisome about the Draft PEIR, however, is this: If the Draft PEIR were finalized as presently drafted, SCAG would mandate the application of project mitigation measures that already conflict with, or will quickly conflict with, evolving and dynamic regulations covering a variety of topics. For example, the Draft PEIR prescribes mitigation requirements concerning matters that involve storm water management, home energy efficiency standards, fire protection, landscaping, water supply analyses, and municipal sewage treatment facilities – all of which are matters and activities that are subject to evolving standards.

For these reasons and those more thoroughly explained in the accompanying appendix, BIASC respectfully urges SCAG to clarify and cull the Draft PEIR.

Concerning the actual policy documents at issue (i.e., the Draft RTP and the Draft SCS themselves), BIASC has one fundamental concern: Page 148 of the Draft SCS suggests that local governments should look to "transportation analysis zone" (TAZ) maps to determine whether a particular project is consistent with the land use designation, density, and building intensity of the SCS. BIASC believes that this section needs to be revised for three distinct reasons.

First, BIASC is informed that the TAZ maps break land masses up into relatively small-scale areas averaging perhaps only about 150 acres in size (and even smaller in more densely populated areas). Requiring determinations about the consistency of future land uses to the SCS – concerning use designations, density, building intensity and the applicable SCS policies – at that fine a scale would be overly-prescriptive. SCAG need not be nearly so prescriptive because SB 375 requires only 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). Given this legislative mandate, there is no reason for SCAG to measure and compare land-use characteristics within the region at the very fine TAZ level vis-à-vis policy determinations.

Instead, the final RTP/SCS should permit local agencies to measure and compare land use characteristics with the regional strategy at a level consistent with the need for reasonable ongoing flexibility in local land use control. Therefore, the level of comparison should be, at the finest, at a city jurisdictional level (including any sphere of influence) – given that there are nearly 200 separate jurisdictions within the SCAG region. BIASC specifically urges SCAG to identify and compare such land use characteristics at no finer a scale than (i) the cities (including their respective adjoining spheres of interest), and (ii) concerning the unincorporated areas outside of local spheres of interest, by comparison to the rough-scale map that indicates generally the locations of building intensification shown in the SCS. *See* Exhibit 2 to the Draft SCS Background Documentation, found at http://rtpscs.scag.ca.gov/Documents/2012/draft/SR/2012dRTP_SCSBackgroundDocumentation.pdf.

Second, BIASC is concerned that any prescriptive use of TAZ maps for policy purposes could have negative consequences vis-à-vis the pending process for a required federal

conformity determination. Under the federal laws that relate to the federal funding of regional transportation infrastructure, an RTP must be constructed using "the latest planning assumptions." "Using the 'latest' planning assumptions means that the conformity determination is based on *the most current information that is available to state and local planners*…." U.S. E.P.A. Guidance for the Use of Latest Planning Assumptions in Transportation Conformity Determinations (EPA420-B-08-901, December 2008), ¶ 2.2 (emphasis in the original), found at: http://www.epa.gov/otaq/stateresources/transconf/policy/420b08901.pdf and incorporated herein by reference. If and to the extent that SCAG's TAZ-level maps and the data reflected in them are unacceptable to local planners and were not available to them when the RTP was developed, then fine-scale data based upon the TAZ maps should not be incorporated into the RTP via the SCS. They would instead need to be separated out from the RTP and – at most – made part of an "alternative planning scenario" (APS) under California Government Code section 65080(b)(2)(H). We believe that any conflict between the federally-mandated RTP approach and the SCS TAZ-level maps can be avoided by making all relevant policy determinations based on comparisons viewed at the city level (including any sphere of influence) and by reference to the generalized locations depicted for intensification in unincorporated county areas (for example, in Exhibit 2 to the *Background Documentation* as noted above).

Third, no TAZ-level maps were provided to the public as part of either the Draft RTP/SCS or the Draft PEIR, nor were they included in any of the appendices that SCAG provided to the public. Hopefully, the omission reflects SCAG's pre-publication determination to forgo the use of any TAZ-level maps for policy purposes. If this were the case, then it appears that SCAG's staff inadvertently failed to revise page 148 of the Draft SCS prior to its publication for comment; and SCAG should now revise that page to reflect a more appropriate approach (the jurisdictional approach suggested above). If, however, SCAG actually intended the policy prescription that is suggested on page 148 of the Draft SCS, then SCAG must be faulted for having failed to disclose an essential component of the RTP/SCS, which is the new level of policy prescription that such TAZ-level maps would impose or induce through the implementation of SB 375.

Under judicial precedents decided pursuant to the California Environmental Quality Act (CEQA), SCAG's public disclosures in the Draft RTP/SCS and the Draft PEIR would be inadequate if they failed to disclose TAZ-level policy prescriptions affecting the region's population distributions and concentrations:

> The detail [of draft disclosure concerning changes induced in population distribution, population concentration, and the human use of the land] required in any particular case necessarily depends on a multitude of factors, including, but not limited to, *the nature of the project, the directness or indirectness of the contemplated impact and the ability to forecast the actual effects the project will have* on the physical environment.

Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 369 (emphasis added).

In short, if SCAG were planning to utilize the TAZ-level maps as actual policy drivers (as page 148 of the Draft SCS may suggest), then SCAG needed to disclose the details of those TAZ maps; and SCAG did not. *See* CEQA Guidelines, Tit. 14, § 15144 ("an agency must use its best efforts to disclose all that it can"). SCAG would also need to have analyzed environmental impacts in much more detail than presented in the Draft PEIR, including the thousands of direct conflicts between TAZ maps for established communities and CEQA thresholds relating to General Plan compliance, Quimby Act compliance, impacts to protected greenbelts and historic resources, local congestion and traffic safety impacts, impacts to schools and other public services. Therefore, BIASC respectfully asks SCAG to revise page 148 of the SCS to avoid the insinuation that TAZ-level maps should be utilized for any future regulatory or policy purpose.

As a final additional comment on the draft policy documents, we note that two of SCAG's brethren metropolitan planning organizations (one in the San Diego area another in the Sacramento area) have each included a 2050 planning year horizon in their respective RTP/SCS documentation. Such a long-term perspective seems appropriate to consider because land use and transportation patterns evolve relatively slowly; and they are subject to numerous variables (e.g., the economy, and the allocation of federal funding for regional transportation projects). Accordingly, SCAG's ambitious vision for higher density development patterns along transit corridors may not be realized for many decades.

In the nearer term (2020 and 2035), the statewide targets for GHG reductions which were established pursuant to Assembly Bill 32 (2006) may be more feasibly be realized through other measures such as renewable energy, cleaner cars and cleaner fuels, and stationary source controls, as the California Air Resources Board's AB 32 Scoping Plan explains. It is possible that, in light of analytical constraints prescribed by CARB, the SCAG region cannot realistically attain the 2020 and 2035 GHG emission reduction targets established by CARB, in which case an APS may be appropriate. Therefore, SCAG's consideration of a longer-term, 2050 planning horizon may be a useful framework for informing local agencies and other interested stakeholders about a more feasible, longer-term regional planning effort.

To conclude, BIASC wishes to once again commend SCAG's staff for its willingness to be open and frank with BIASC's representatives about a whole range of points of views concerning the RTP/SCS and its potential impacts. BIASC looks forward to working with SCAG's staff through the completion of this challenging process and beyond as the final RTP takes shape and ultimately takes effect.

Respectfully,

Andrew R. Henderson
Vice President and General Counsel

Steven.S. Schuyler
Vice President Government Affairs

cc: Mr. Hasan Ikhrata

Attachment (appendix)

Appendix to the February 14, 2012 Comment Letter from Building Industry Association of Southern California, Inc. to Southern California Association of Governments

Detailed Comments on the Draft PEIR on the Draft 2012 RTP/SCS

In furtherance of the comments set forth in the accompanying letter, Building Industry Association of Southern California, Inc. respectfully submits the additional, detailed comments set forth below for SCAG's consideration and response:

To preface, the Draft RTP/SCS and Draft PEIR are both comprehensive in nature; but -- like all draft documents – they require clarification, correction, and revision as SCAG works to prepare the final versions of the RTP/SCS and PEIR for the SCAG Regional Council's possible certification and approval. This appendix, therefore, provides a number of specific comments on the draft documents; in accordance with CEQA (see, *e.g.*, CEQA Guidelines, § 15088). BIASC respectfully requests that responses to each of these comments be included in the Final PEIR.

As background, the Draft RTP reflects a long-range plan that includes transportation projects, policies, and a financial plan to create a blueprint for the region's multimodal transportation system through 2035. The RTP improvements include transportation investments in projects to close critical gaps in the network that hinder access to certain parts of the region, and to strategically enhance the region's transportation system to increase mobility for the region's residents and economy.

The SCS -- a component of the RTP -- is a strategy required by SB 375 (Chap. 728, Statutes 2008), also known as the Sustainable Communities and Climate Protection Act of 2008. SB 375 directs the California Air Resources Board (CARB) to set regional targets for the reduction of greenhouse gas (GHG) emissions, consistent with AB 32, California's Global Warming Solutions Act of 2006. The RTP's SCS component contains strategies to reduce GHG emissions from passenger vehicles by eight percent per capita by 2020 and 13 percent per capita by 2035, compared to 2005, as set by CARB.

Among other things, the SCS is a growth strategy for the region which, in combination with transportation policies and programs, strives to reduce GHG emissions from passenger vehicles and, if feasible, help meet CARB's reduction targets. (Gov. Code, § 65080(b)(2)(B).) This growth strategy is implemented when the SCS "sets forth a forecasted development pattern" for the region. (*Id.*) It is important to emphasize that that this development pattern must comply with federal law, which requires that any pattern be based upon "current planning assumptions" that include the information in local general plans and adopted sphere of influence boundaries. (Gov. Code, § 65080(b)(2)(B), (G).) Local jurisdictions (*i.e.*, cities and counties) are full partners in this process and retain full local land use decision-making and zoning authority. (Gov. Code, § 65080(b)(2)(K).)

The Draft PEIR represents a public disclosure and information document to be prepared in accordance with CEQA and the State CEQA Guidelines. The Draft PEIR is required to describe the proposed RTP/SCS project, its potential significant environmental impacts, alternatives to the proposed project, and the proposed mitigation measures to avoid or minimize the identified significant environmental effects.

BIASC's Specific Comments on the Draft PEIR

1. The Draft PEIR, Section 1.0, Introduction, page 1-5, should be revised to delete the sentence stating that proposed mitigation measures "can be incorporated as policies in the final 2012-2035 RTP/SCS and will help ensure that feasible mitigation measures are implemented at the project level." Similarly, page 149 of the Draft RTP/SCS should be revised to eliminate the "mandate" language and instead state: "The following tables list specific implementation strategies that local governments, SCAG and other stakeholders may use or consider while preparing specific projects that help ~~can and should undertake in order~~ to successfully implement the SCS."

Explanation: First, there is no legal requirement for the Draft PEIR's proposed mitigation measures to be incorporated as policies in the Final RTP/SCS. Second, SCAG's Regional Council, as its decision-making body, retains the discretion to determine whether the Draft PEIR's proposed mitigation measures are actually feasible and this determination is made as part of the Regional Council's findings adopted in compliance with CEQA. The Draft PEIR should not limit or constrain the Regional Council's discretion to make mitigation feasibility determinations required by CEQA. Indeed, the Draft PEIR exceeds its authority under CEQA by appearing to dictate "feasible" mitigation measures -- a decision reserved for the Regional Council as part of its final, deliberative decision-making process.

2. The Draft PEIR, Section 1.0, Introduction, page 1-5, should be revised to delete the following text:

> "The implementing agencies and local lead agencies shall be responsible for ensuring adherence to the mitigation measures as 2012-2035 RTP/SCS projects are considered for approval over time. Lead agencies shall provide SCAG with documentation of compliance with mitigation measures through SCAG's monitoring efforts, including SCAG's Intergovernmental Review (IGR) process."

Explanation: First, SCAG has no jurisdiction or legal authority to require "implementing agencies and local lead agencies" to ensure adherence to the mitigation measures found in the Draft PEIR or those measures ultimately adopted by the Regional Council. Second, no "implementing agencies or local lead agencies" are required by law to consider the Final PEIR mitigation measures unless the agency decides to "tier" from SCAG's Final PEIR in preparing project-level environmental analysis. Finally, based on staff's statements during workshops and other public processes, SCAG's original intent was never to impose such requirements on implementing agencies and local lead agencies. Therefore, the text should be deleted to clarify it was never SCAG's intent to prescribe mitigation upon implementing agencies, local lead agencies, or project sponsors.

3. The Draft PEIR, Section 1.0, Introduction, page 1-6, should be revised to delete the following text:

> "CEQA provides that an EIR can include feasible mitigation measures that are within the responsibility and jurisdiction of another agency. The appropriate CEQA finding in such instances is that such mitigation measures have been or "can and should be" adopted. (Pub. Resources Code, § 21081(a)(2); CEQA Guidelines §15092(a)(2).) When this finding is made, there is no further requirement that SCAG find that mitigation measures that are within the responsibility and jurisdiction of another agency have been incorporated into the project. That latter finding is reserved for mitigation measures within SCAG's responsibility and jurisdiction."

Explanation: First, CEQA does not provide that an EIR can include feasible mitigation measures within the responsibility and jurisdiction of another agency. Instead, CEQA (Pub. Resources Code, § 21081(a)) allows, but does not require, a lead agency to adopt the "can and should" finding provided it has no jurisdiction to address the identified significant impacts with mitigation measures that it can enforce through permit conditions, agreements, or other measures. (See CEQA Guidelines, § 15091(c), (d).) Further, the "can and should" finding is only "one or more" of the findings specified in section 21081(a) that needs to be adopted.

Second, when making the findings in Public Resources Code section 21080(a)(2) -- *i.e.*, the "can and should" findings--SCAG, in any case, is not required to adopt such "can and should" measures in its Mitigation Monitoring and Reporting Plan (MMRP). (See CEQA Guidelines § 15091(d), which only requires the lead agencies' mitigation measures to be part of the MMRP.)

Third, the Draft PEIR's "can and should" measures are not required to be considered or adopted by implementing agencies, local agencies, or project sponsors, unless they decide to "tier" from SCAG's Final PEIR when preparing project specific environmental analysis. Further, as explained in paragraph 12, below, the Draft PEIR's "can and should" measures are beyond SCAG's jurisdiction and legal authority; they are inconsistent with policy considerations that the SCAG Regional Council should consider before certifying the Final PEIR and approving the RTP/SCS; and, they are duplicative of existing federal, state, regional, and local regulatory frameworks with their own, separate NEPA or CEQA compliance requirements.

4. The Draft PEIR, Section 1.0, Introduction, page 1-6, must be revised to delete the following text:

> "Nevertheless, it is reasonable to expect that the other agencies will actually implement the mitigation measures assigned to them (see discussions below of transportation and land use planning and development projects)."

Explanation: This statement was made in connection with the Draft PEIR's "can and should" mitigation measures. However, SCAG has no jurisdiction or legal authority to "assign"

mitigation measures to implementing agencies, lead agencies, or project sponsors, nor is there any evidence in the record to support SCAG's statement that it is "reasonable to expect that other agencies will actually implement" the "can and should" measures identified in the Draft PEIR. As stated above, no agency or project sponsor is required to consider any of the "can and should" mitigation measures in the PEIR, unless the agency decides to "tier" from SCAG's Final PEIR in preparing project-level environmental analysis.

5. The Draft PEIR, Section 1.0, Introduction, page 1-7, must be clarified as shown below:

"**Transportation Project Mitigation**

SCAG has limited authority to approve individual second-tier transportation network improvement projects in the RTP. Most individual transportation projects in the RTP will be implemented by Caltrans, county transportation commissions, local transit agencies, and local governments. ~~These agencies 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 the proposed mitigation measures are feasible and effective. Therefore, it is reasonable to expect that these agencies will actually implement them.~~

Land Use Planning and Development Project Mitigation

SCAG has no authority to adopt local land use plans or approve local land use projects that will implement the SCS. As described in the section below, SB 375 specifically provides that nothing in SB 375 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. (Government Code §65080(b)(2)(K). Local governments are the main agencies responsible for mitigation of the impacts of land use plans and projects that implement the RTP/SCS, and SCAG has no concurrent authority to mitigate the impacts of land use plans and projects. ~~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.~~"

Explanation: First, SCAG's record does not support the Draft PEIR's statement that implementing agencies, local agencies, or project sponsors "routinely implement" the types of mitigation measures identified in the Draft PEIR. In fact, there is no "routine" or "formula" associated with the identification and ultimate adoption of mitigation measures. Instead, such measures are identified in response to a specific project's significant environmental impacts and those impacts depend upon the project's unique characteristics, location, topography, relation to other development, and numerous other unique site conditions. Further, once an EIR identifies

proposed mitigation measures specific to the project and its conditions, the lead agency retains ultimate discretion to adopt such measures or reject them on infeasibility grounds. (Pub. Resources Code, § 21081(a)(3); CEQA Guidelines, § 15091(a)(3).)

Second, the Draft PEIR asserts that it made a "preliminary determination that these mitigation measures are feasible and effective." Again, however, the Draft PEIR's statement is not supported by any evidence or analysis contained in the record. Finally, nothing in the Draft PEIR or record supports the statement that it is "reasonable to expect that local governments will actually implement" SCAG's "can and should" mitigation measures.

6. The Draft PEIR, Section 1.0, Introduction, page 1-12, should be clarified as follows:

"**CEQA Incentive**

As previously discussed, SB 375 provides incentives in the form of CEQA streamlining to encourage community design that supports reduction in per capita GHG emissions. The land use input for SCAG's SCS was created with the use of Traffic Analysis Zones (TAZ) and Development Types. "Development Types" were made at the TAZ level of geography (with an average size of 160 acres) to offer local jurisdictions ~~adequate~~ information ~~and flexibility~~ to make ~~appropriate~~ consistency findings for projects eligible to receive CEQA streamlining benefits.

The Development Types used in the SCS do not represent detailed, parcel-level land use designations such as those found within a local jurisdiction's General Plan, but rather represent the aggregation of multiple land uses, densities and intensities that are expected to preponderate at the jurisdictional level ~~or average out within a neighborhood-sized area~~ by 2035. Each Development Type is comprised of various characteristics related to employment and housing density, urban design, mix of land uses, and transportation options. Details describing the characteristics contained within each Development Type are available in Appendix: SCS Background Documentation. The lead agency, not SCAG, will be responsible for making the determination of consistency for CEQA streamlining purposes, pursuant to the provisions of SB 375, for any given proposed project. See Govt. Code § 65080(b)(2). ~~One way of determining consistency is if a proposed residential/mixed use or TPP conforms to the Development Type designated for a TAZ.~~

The Development Types are expressed in terms of use designations, densities and building intensities; and, for any given type, there is one residential density indicated. For example, the "Town Center" 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 as described above, may be deemed by the lead agency to be consistent with the SCS so long as the project achieves consistency at the jurisdictional level, considering the ~~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.

SCAG's growth projection data is available on its website for lead agencies to use to determine whether projects are consistent with the SCS."

Explanation: The above clarifications are required to ensure that the SCS consistency determination is made by the local land use agencies, not SCAG, and that CARB's assessment of that consistency will be evaluated at the broader jurisdictional/regional level, as anticipated by CARB in its July 2011 "Description of Methodology for ARB Staff Review of Greenhouse Gas Reductions from Sustainable Communities Strategies (SCS) Pursuant to SB 375," which is incorporated by this reference.

Additionally, this jurisdictional (*i.e.*, city/county) level is more appropriate when compared to smaller geographic levels, such as Traffic Analysis Zones (TAZs) or parcel assessments that would limit cities and counties' control over land use. While the SCS sets forth forecasted development patterns that may differ from those envisioned in various general plans, those patterns, nonetheless, still must be consistent with "current planning assumptions" and those assumptions must be grounded in the local general plans and sphere of influence boundaries. (See Gov. Code, § 65080(b)(2)(B).)

Please also revise/clarify all same/similar text found in the Draft PEIR, Section 2.0, Project Description (see, for example, page 2-29).

7. The Draft PEIR, Section 2.0, Project Description, page 2-2, should be revised to clarify the summary of the required "contents" of the SCS. Currently, the Draft PEIR states:

"According to Section 65080 of the California Government Code, in summary the SCS must:

- Identify existing land use;
- Identify areas to accommodate long-term housing needs;
- Identify areas to accommodate an eight-year projection of regional housing needs;
- Identify transportation needs and the planned transportation network;
- Consider resource areas and farmland;

- Consider state housing goals and objectives;
- Set forth a forecasted growth and development pattern; and
- Comply with federal law for developing an RTP."

Explanation: The above text must be revised and clarified. The SCS is a growth strategy for the region which, in combination with transportation policies and programs, strives to reduce GHG emissions and, if it is feasible, help meet CARB's emission targets for the region. Specifically, a SCS must:

(a) Identify the general location of uses, residential densities, and building intensities with the region;

(b) Identify areas with the region sufficient to house *all* the population of the region, including all economic segments of the population, over the course of the RTP's planning horizon;

(c) Identify areas within the region sufficient to house an eight-year projection of the regional housing need of the region;

(d) Identify a transportation network to service the transportation needs of the regions;

(e) Gather and consider the best practically available scientific information regarding resource areas and farmland in the region;

(f) Consider the state housing goals;

(g) Set forth a forecasted development pattern for the region, which, in combination with the transportation network and other transportation policies, will reduce the GHG emissions from passenger vehicles, if it is feasible, and help meet CARB's emission targets in the region; and

(h) Quantify the reductions in GHG emissions the SCS is projected to achieve and any shortfall in reaching the regional target.

(See Gov. Code, § 65080(b)(2)(B), (H).)

It is important to disclose that the SCS's "forecasted development pattern" must comply with federal law, which requires that any pattern be based upon "current planning assumptions" that include the information in local general plans and sphere of influence boundaries. (Gov. Code, § 65080(b)(2)(B), (G).)

Please revise the Draft PEIR or incorporate the above text into the Final PEIR. Additionally, the same text (quoted above) is repeated in Draft PEIR, Section 2.0, Project Description, on page 2-25, and that text also requires the same revisions/clarifications specified above.

8. The Draft PEIR, Section 2.0, Project Description, page 2-2, should be revised as follows:

"SCAG's SCS demonstrates the region's ability to attain the GHG emissions reduction targets set forth by the ARB. The SCS outlines SCAG's ~~plan~~ strategy for integrating the transportation network ~~and related strategies~~ with an overall land use pattern that ~~responds to projected~~ predicts or forecasts growth, housing needs and changing demographics, and transportation demands. However, neither the SCS nor an alternative planning strategy will supersede a city's or county's general plan or other planning policies or authorities. Nor must a local agency's planning policies, including the general plan, be consistent with either strategy."

Explanation: The above revisions are required to clarify that the SCS is a growth strategy based on a forecasted development pattern of growth for the region and that the SCS does not supersede a city's or county's general plan or other planning policies or authorities.[1] Further, a local agency's land use policies, including its general plan, need not be consistent with the RTP's SCS. (See Gov. Code, § 65080(b)(K).)

Please also see Draft PEIR, Section 2.0, Project Description, at page 2-25. The same text (quoted above) is presented on page 2-25, and also requires the same revisions/clarifications specified above.

9. The Draft PEIR, Section 2.0, Project Description, page 2-25, states:

"In accordance with Government Code Section 65080(b)(2)(B)(vii), the 2012-2035 RTP/SCS will achieve GHG emission reductions of eight percent per capita in 2020 (meeting the target for 2020) and 16 percent per capita in 2035 (surpassing the 13 percent reduction target for 2035)."

Comment: Government Code section 65080(b)(2)(B)(vii) states that the SCS must set forth a "forecasted development pattern for the region," which, in combination with the transportation network and other transportation policies, will reduce GHG emissions from passenger vehicles to achieve, if feasible, the CARB's GHG emission reduction targets. Section 65080 does not call for exceeding CARB's targets. While perhaps laudable, it also reflects that SCAG went beyond the legal requirements set forth in that section.

Please explain the legal basis for exceeding those legal requirements. Additionally, please clarify and confirm that any consistency determinations will be based on CARB's reduction targets for the region (eight percent per capita reduction in 2020 and 13 percent per capita reduction in 2035), and *not* on the SCS projection of 16 percent per capita reduction in 2035.

10. The Draft PEIR, Section 2.0, Project Description, page 2-27, sets forth a description of the SCS's forecasted development patterns, which should be revised as follows:

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[1] The Institute for Local Government emphasizes this point in its write-up of "The Basics of SB 375: Transportation, Housing and Greenhouse Gases," which is found at http://www.ca-ilg.org/SB375Basics and incorporated by this reference.

Land Use Development Pattern. The land use development pattern of the 2012-2035 RTP/SCS, which assumes a significant increase in small-lot single-family and multi-family housing will mostly occur in infill locations near transit infrastructure, in so-called HQTAs [High-Quality Transit Areas]. In some cases, the land use pattern assumes that more of these housing types will be built than is currently anticipated in local general plans, and in most cases, this shift in housing type -- especially the switch from large-lot to small-lot single-family homes—will occur only if local land use jurisdictions exercise their discretion in approving such shifts from large-lot to small-lot development and amend their zoning and general plans, specific plans, areas plans, etc., to reflect such approvals. ~~naturally in the marketplace as developers shift to products in high demand.~~

. . .

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. It moves the region towards more compact, mixed-use development leading to more opportunities for walking and biking, more transit use, and shorter auto trips. The 2012-2035 RTP/SCS ~~allocates~~ forecasts growth according to five community types that are further subdivided into 13 development types. The 13 development types, provide for a broad range of housing types, including smaller-lot single family homes, townhomes, and multifamily condominiums and apartments. In forecasting the SCS development land use pattern, SCAG recognizes the RTP/SCS is not to directly regulate the use of land or affect the land use authority of cities and counties within a given region. (Government Code §65080(b)(2)(K).) Further, SCAG acknowledges that the law (i.e., SB 375) does not require that a local general plan, specific plan, or zoning be "consistent" with the RTP/SCS. (Ibid.) Finally, SCAG recognizes the authority of local jurisdictions to regulate land use through their police powers as authorized by California law and that nothing in the RTP/SCS supersedes the local jurisdictions' exercise of their land use authority.

Explanation: At least two reasons justify revisions to the above quoted text in order to be consistent with applicable law (*i.e.*, SB 375). (Gov. Code, § 65080.) First, according to the Draft PEIR, the forecasted land use development pattern in the SCS, in some cases, assumes that *more* high-density housing will be built than is currently anticipated in the local general plans of the affected counties and cities. However, SB 375 requires the contemplated land use development pattern in the SCS -- a component part of the RTP -- to utilize "the most recent planning assumptions considering local general plans and other factors." (Gov. Code, § 65080(b)(2)(B).) Unfortunately, SCAG has deviated substantially from the locally adopted general plans, and has made its own land use assumptions that are in conflict with the land use plans of adopted general plans within the region.

Second, the draft SCS and associated Draft PEIR both blur the line between regional planning (*i.e.*, preparing the required SCS forecasted land use development pattern) and local land use authority and jurisdiction. The SCS is not to directly regulate the use of land or affect the land use authority of cities and counties within a given region. (Gov. Code, §

65080(b)(2)(K).) Additionally, the law (*i.e.*, SB 375) does not require that a local general plan, specific plan, or zoning be "consistent" with the SCS. (*Ibid.*) Despite these legal limitations, SCAG has made a "shift" in housing types -- deviating from the most recent planning assumptions in the locally adopted general plans -- stating that the shift or "switch" will "occur naturally" in the marketplace due to shifting demands. However, this shift does not "occur naturally." 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, unless and until the local land use jurisdictions adopt the requested discretionary approvals.

Please revise/clarify all same or similar text in the Draft PEIR (see, for example, page 2-30).

11. The Draft PEIR, Section 2.0, Project Description, page 2-35, should be revised as follows:

> SCAG will use this PEIR as part of its review and approval of the 2012-2035 RTP/SCS. The lead agencies for individual projects may use this PEIR as the basis of their regional and cumulative impacts analysis. ~~In addition, for projects that may be eligible for CEQA Streamlining, applicable mitigation measures from this EIR shall be incorporated into those projects as appropriate. It is the intent of SCAG that member agencies and others use the information contained within the PEIR in order to "tier" subsequent environmental documentation of projects in the region.~~ Information from this document may also be incorporated in future County Congestion Management Programs and associated environmental documents, as applicable.

Explanation: The deleted text is stricken, above, to clarify SCAG's likely original intent. First, as to projects that may be eligible for CEQA streamlining under SB 375, the local agencies (*i.e.*, cities/counties) ultimately will be responsible for the project-level environmental analysis and no law or regulation requires that analysis to "incorporate" the PEIR's mitigation measures into those projects. The local agencies retain that discretion, based on the project-level environmental analysis conducted and the mitigation measures to reduce or avoid the identified significant impacts. Second, member agencies, project sponsors, and others are not required to use the information contained in the PEIR, unless their project-level environmental analysis "tiers" from SCAG's Final PEIR.

12. The Draft PEIR, Section 3.0, Environmental Setting, Impacts & Mitigation Measures, sets forth over 500 proposed mitigation measures. The Draft PEIR's Executive Summary also identifies each measure. In general, the Draft PEIR's proposed "can and should" mitigation measures must either be rejected on infeasibility grounds or revised substantially for the following reasons:

(a) SCAG has no authority/jurisdiction to require other agencies to implement project-specific mitigation measures;

(b) SCAG has no authority/jurisdiction to monitor mitigation compliance and to incorporate the mitigation as "policies" in the RTP/SCS;

(c) SCAG has provided no evidence or analysis substantiating its belief that the identified measures are "feasible;"

(d) Member agencies, project sponsors, and others retain the discretion to determine which measures are feasible for any given project at subsequent project-specific stages;

(e) Several of the Draft PEIR's proposed mitigation measures are outside of SCAG's jurisdiction and authority;

(f) Many of the Draft PEIR's proposed mitigation measures are not desirable based on policy considerations; and

(g) Numerous Draft PEIR's proposed mitigation measures are duplicative of existing federal, state, regional, and local statutory or regulatory frameworks that require their own NEPA or CEQA compliance; and, therefore, are unnecessary.

Notably, the Draft RTP/SCS, page 75, includes the "2012 RTP Environmental Mitigation" program, which is based on the proposed mitigation measures listed in the Draft PEIR. The Draft RTP/SCS, page 75, states that the list of all the mitigation measures included in the PEIR also will be included in the "Environmental Mitigation Report" of the Final RTP/SCS. On pages 76-84, the draft plan then summarizes the Draft PEIR's proposed mitigation measures for all 13 environmental categories addressed in that document. Many of the RTP/SCS summaries repeat the mandates (*i.e.*, "require") and the outcome-determinative provisions (*i.e.*, "ensure") set forth in the proposed mitigation measures contained in the Draft PEIR. This discussion needs to be revised in a manner that is consistent with the content of the Final PEIR. Additionally, the Draft RTP/SCS's "Environmental Mitigation Program," pages 75-84, must be revised, consistent with SCAG's revisions and clarifications that are required to be made to the "can and should" mitigation measures set forth in the Draft PEIR. Absent revisions to this section of the Draft RTP/SCS, there will be a serious inconsistency between the plan and the PEIR.

13. The Draft PEIR contains several proposed mitigation measures that mimic comprehensive, existing statutory or regulatory requirements; and, therefore, they (and numerous other measures) should be rejected or revised substantially in order to eliminate needless regulatory duplication. The following Draft PEIR mitigation measures are cited as examples:

> **MM-BIO/OS17:** Project sponsors can and should replace any disturbed wetland, riparian or aquatic habitat, either on-site or at a suitable off-site location at ratios to ensure no net loss. See **MM-BIO/OS1** through **MM-BIO/OS14**.

MM-BIO/OS18: Project sponsors can and should ensure that when individual projects include unavoidable losses of riparian or aquatic habitat, adjacent or nearby riparian or aquatic habitat should be enhanced (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).

MM-BIO/OS50: For projects adjacent to natural watercourses, project sponsors can and should submit a vegetation management plan for review and approval by the Lead Agency that includes, as deemed appropriate, the following measures:

- Identify and do not disturb a 20-foot buffer from the top of the natural watercourse. If the top of bank cannot be identified, leave a 50-foot buffer from the centerline of the watercourse or as wide a buffer as possible between the watercourse centerline and the proposed site development.
- Identify and leave" islands" of vegetation in order to prevent erosion and landslides and protect nesting habitat.
- Leave at least 6 inches of vegetation on the site.
- Trim tree branches from the ground up (climbing up) and leave tree canopy intact.
- Leave stumps and roots from cut down trees to prevent erosion.
- Plant fire-appropriate, drought-tolerant, preferably native vegetation.
- Err on the side of caution; if a plant, tree or area is sensitive, obtain a second opinion before cutting.
- Provide erosion and sediment control protection if cutting vegetation on a steep slope.
- Leave tall shrubbery at least 3-feet high.
- Fence off sensitive plant habitats and creek areas to protect from animal grazing as appropriate and necessary.
- Do not clear-cut vegetation. This can lead to erosion and severe water quality problems and destroy important habitat.
- Do not remove vegetation within 20-feet of the top of bank. If the top of bank cannot be identified, do not cut within 50-feet of the centerline of the natural watercourse or as wide a buffer as possible between the natural watercourse centerline and the proposed site development.
- Do not trim/prune branches that are larger than 4 inches in diameter.
- Do not remove tree canopy.
- Do not dump cut vegetation in a creek.
- Do not cut tall shrubbery to less than 3-feet high.
- Do not cut of short vegetation (grasses, ground-cover) to less than 6-inches high.

These measures (and several others) are unnecessarily duplicative of the comprehensive wetlands/riparian/aquatic habitat regulatory scheme that is already in place at the federal level through the Clean Water Act section 404 permitting process overseen by U.S. Army Corps of Engineers, and at the state level through the California Department of Fish and Game's section

1600 streambed alteration program. This regulatory/jurisdictional scheme comprehensively addresses significant impacts to wetlands, riparian, and aquatic habitat and associated resources. The regulatory/jurisdictional scheme also requires its own NEPA and/or CEQA compliance. Therefore, such measures should be rejected, particularly when project-specific conditions and other factors are unknown.

14. Other examples of Draft PEIR mitigation measures that are duplicative of existing statutory or regulatory frameworks with their own environmental requirements are provided below:

> **MM-BIO/OS20:** If specific project area trees are designated as "Landmark Trees" or "Heritage Trees", then approval for removals can and should be obtained through the appropriate entity, and appropriate mitigation measures can and should be developed at that time, to ensure that the trees are replaced. Mitigation trees can and should be locally-collected native species.
>
> **MM-BIO/OS21**: Retention of trees on-site can and should be prioritized consistent with local regulations. Adequate protection can and should be provided during the construction period for any trees that are to remain standing, including the following, plus any recommendations of an arborist:
>
> a. Before the start of any clearing, excavation, construction or other work on the site, every protected tree deemed to be potentially endangered by said site work, can and should be securely fenced off. Such fences can and should remain in place for duration of all such work. All trees to be removed can and should be clearly marked. A scheme can and should be established for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree.
>
> b. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, special measures can and should be incorporated to allow the roots to breathe and obtain water and nutrients. Any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter should be minimized. No change in existing ground level should occur from the base of any protected tree at any time. No burning or use of equipment with an open flame should occur near or within the protected perimeter of any protected tree.
>
> c. No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees should occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. No heavy construction equipment or construction materials should be operated or stored within a distance from the base of any protected trees. Wires, ropes, or other devices should not be attached to any protected tree, except as needed for support of the tree. No sign,

other than a tag showing the botanical classification, should be attached to any protected tree.

d. Periodically during construction, the leaves of protected trees can and should be thoroughly sprayed with water to prevent buildup of dust and other pollution that would inhibit leaf transpiration.

e. If any damage to a protected tree should occur during or as a result of work on the site, the project sponsor can and should immediately notify the appropriate local agency of such damage. If, such tree cannot be preserved in a healthy state, the local agency can and should require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.

f. All debris created as a result of any tree removal work can and should be removed by the project sponsor from the property within two weeks of debris creation, and such debris can and should be properly disposed of by the project sponsor in accordance with all applicable laws, ordinances, and regulations.

These measures also unnecessarily intrude into local agency (*i.e.*, cities and counties) jurisdiction, which comprehensively regulates designated trees for avoidance, minimization, and mitigation of significant impacts to such sensitive resources. For example, Los Angeles County already has in place the "County of Los Angeles Oak Tree Ordinance," which is a comprehensive permit process regulating significant impacts to oak trees, which are recognized as significant historical, aesthetic, and ecological resources within Los Angeles County. The Los Angeles County Ordinance applies to all unincorporated areas of the County. Cities within Los Angeles County either have adopted the County ordinance or their own ordinance, which may be more stringent. Additionally, the County of Ventura has implemented its "Tree Protection Ordinance," which applies to all unincorporated areas of Ventura County. Likewise, the County of Orange enforces the County's "Tree Code," which requires a permit before almost all tree removal within the County. The County of Riverside has adopted "Oak Tree Management Guidelines;" and San Bernardino County has adopted the Plant Protection Ordinance, which protects trees and calls for replacement when authorized to be removed pursuant to a tree removal permit.

15. Other Draft PEIR mitigation measures exceed SCAG's jurisdiction and authority. Specifically, SCAG's jurisdiction and authority is limited by its structure. More specifically, SCAG is a public agency and voluntary association of counties and cities established in 1965 by a "joint powers agreement" among its members, pursuant to California Government Code section 6500, et seq.[2] SCAG is not an agency with land use, taxing, or regulatory powers,[3] nor is it a special district. As such, it is not "another layer of government." (*Id.*)

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[2] Title I, Division 7, Chapter 5, of the Government Code authorizes two or more public agencies to enter into a joint powers agreement.

Instead, SCAG's purpose is to provide a forum for discussion, study, and development of recommendations on regional issues of mutual interest and concern to its member agencies regarding the orderly physical development of the southern California region.[4] According to SCAG's overall work program (May 2010), SCAG's primary responsibilities include development of the RTP/SCS, the Federal Transportation Improvement Program (FTIP), the annual Overall Work Program, and transportation-related portions of local air quality management plans.[5] According to SCAG, under the federal Clean Air Act, SCAG is responsible for determining whether the transportation plans and programs are in conformity with state air quality plans.[6] SCAG's additional functions include intergovernmental review of regionally significant development projects,[7] periodic preparation of a Regional Housing Needs Assessment (RHNA), and serving as the area-wide wastewater treatment management planning agency under the federal Clean Water Act.

Because SCAG's jurisdiction/authority is limited by its structure, purpose, and powers, SCAG cannot impose "can and should" mitigation measures on local land use jurisdictions/project sponsors. Examples of measures that fall far beyond SCAG's jurisdiction and authority are provided below, and should either be rejected or revised substantially:

> **MM-BIO/OS40:** Project sponsors can and should avoid siting new 2012-2035 RTP/SCS transportation facilities within areas not presently exposed to impacts from transportation facilities. If avoidance is infeasible, the project should minimize vehicular accessibility to areas beyond the actual transportation surface. This can be accomplished through fencing and signage. Additionally, the area of native habitats to be lost to proximity to a transportation facility should be assessed and habitat at a quality of equal or superior value can and should be secured and protected in perpetuity.
>
> **MM-BIO/OS47:** 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 the growth associated with transportation projects and improvements.

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[3] See "Questions and Answers about the Southern California Association of Governments," prepared by SCAG, p. 1-2.

[4] See, SCAG's Joint Powers Agreement, file number 113.

[5] See, *e.g.*, SCAG's Overall Work Program, Fiscal Year 2010-2011, May 2010, p. 1.

[6] SCAG's Overall Work Program, Fiscal Year 2010-2011, May 2010, p. 1.

[7] In this capacity, federal and state laws have required SCAG to review and comment on the consistency of regionally-significant projects with adopted regional plans. If a regional project is determined to be inconsistent, SCAG may suggest adjustments so that the City or County can approve the project, but SCAG has no jurisdiction or authority to "reject" such projects.

MM-BIO/OS49: Project sponsors can and should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, Ventura County Mitigation Guidelines, CDFG's Wildlife Action Plan and any applicable conservation plans.

MM-BIO/OS54: Local jurisdictions or agencies can and should establish policies and programs to restore, protect, manage and preserve conservation areas, including forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas, that remove and sequester carbon from the atmosphere.

MM-BIO/OS55: Conservation Area Development: Local jurisdictions or agencies can and should establish programs and funding mechanisms to create protected conservation areas, including:

- Imposing mitigation fees for development on lands that would otherwise be conservation areas, and use the funds generated to protect other areas from development;

- Proposing for voter approval a small tax increment (e.g., a quarter cent sales tax, perhaps for a finite time period that could be renewed) to fund the purchase of development rights in conservation areas, or purchase of the land outright.

MM-BIO/OS56: Conservation Area Preservation: Local jurisdictions or agencies can and should establish policies to preserve existing conservation areas, and to discourage development in those areas.

MM-BIO/OS59: Local jurisdictions or agencies can and should evaluate existing landscaping and options to convert reflective and impervious surfaces to landscaping, and install or replace vegetation with drought-tolerant, low-maintenance native species or edible landscaping that can also provide shade and reduce heat-island effects.

16. Several of the biology-related Draft PEIR mitigation measures also prescribe specific mitigation ratios. Such measures should be revised. For example, MM-BIO/OS19 should be revised, as follows:

MM-BIO/OS19: For projects near water resources project sponsors can and should implement Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport. (See also Water Resources Mitigation Measures.) ~~Mitigation for occupied habitat impacted is likely to be compensatory off-site acquisition or protection of similar~~

~~habitats at a ratio of 3:1 (compensation acres to that impacted) or other similar ratio with the approval of the USFWS.~~

Explanation: The above measure should be revised to ensure that SCAG does not exceed its authority in an area (*i.e.*, biology) that falls outside of its jurisdiction. In short, the project sponsors, in consultation with the applicable resource agency (*e.g.*, CDFG), have the discretion to arrive at mitigation ratios or not, based on project-specific considerations and other factors that are not known to SCAG at this time. The same rationale applies with equal force to all of the Draft PEIR measures that prescribe mitigation ratios (*e.g.*, MM-BIO/OS19, 22-23, 25-28, 30, 32-34).

17. The Draft PEIR, Section 3.8, Land Use & Agricultural Resources, contains numerous mitigation measures that exceed SCAG's jurisdiction and authority, particularly where, as here, SB 375 does not allow SCAG to regulate the use of land or affect the land use authority of cities and counties within its region. The land use-related measures that fall into this category are: MM-LU15-20, 23-27, 33-34, 41-46, 58-64, and 80-81. More specifically, the following measures are illustrative:

> **MM-LU42:** Local jurisdictions or agencies can and should establish an urban growth boundary (UBG) 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.
>
> **MM-LU43:** Urban development can and should occur only where urban public facilities and services exist or can be reasonably made available.
>
> **MM-LU44:** 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.
>
> **MM-LU45:** Local jurisdictions can and should redirect new growth into existing city/urban reserve areas
>
> **MM-LU46:** Local jurisdictions can and should maintain a one dwelling unit per 10-acre minimum lot size or lower density in areas outside designated urban service lines.

Each measure intrudes into the local land use authority and jurisdiction of SCAG's member agencies, project sponsors, and other agencies; and such measures fall well beyond SCAG's limited jurisdiction and authority. The law (*i.e.*, SB 375) makes clear that the RTP/SCS is not to directly regulate the use of land or affect the land use authority of cities and counties within a given region. (Gov. Code, §65080(b)(2)(K).) Additionally, the law does not require that a local general plan, specific plan, or zoning be "consistent" with the RTP/SCS. (*Ibid.*) SCAG also has recognized and respected the authority of agencies to regulate land use through

their broad police powers as authorized by California law. SCAG has recognized that nothing in the RTP/SCS supercedes its member agencies' exercise of their land use authority. By rejecting all such measures, SCAG will have clarified its original intent, and the PEIR will be consistent with applicable law (*i.e.*, SB 375).

In addition, the above measures call for the creation of urban growth boundaries, city/urban reserve areas, and designated urban service lines. However, all such concepts are ordinarily part of a local jurisdiction's growth control measures that are accompanied by local voter approval before enactment; as such, such measures are not appropriate for inclusion in a program EIR.

Please confirm SCAG's limited jurisdiction and authority, and ensure that the Final PEIR expressly acknowledges that limited jurisdiction and authority and only employs a mitigation construct that is consistent with it. Also, please confirm SCAG's recognition of the legal limitations set forth in SB 375.

18. The Draft PEIR also contains proposed mitigation measures that fall far outside SCAG's limited jurisdiction and authority in other environmental categories aside from biology/open space and land use/agricultural resources. While the list is not exhaustive, each of the following greenhouse gas, noise, population/housing, public services, traffic, and water mitigation measures either should be rejected by the SCAG Regional Council, or revised substantially: MM-GHG3, 8, 11; MM-NO12, 16; MM-POP1; MM-PS3, 14, 25, 37, 39, 41, 67-68, 71, 95, and 121; and MM-TR17, 23, 28, 35, 83, 85, and 96; and MM-W59-60 and 65.

19. Still other Draft PEIR proposed mitigation measures would cause one or more significant effects; however, those effects are not discussed in the PEIR. This omission is particularly troublesome. CEQA Guidelines section 15126.4(a)(1)(D) requires that if SCAG is to adopt such measures and if the measures would cause one or more significant effects, then the PEIR must disclose and discuss such effects. Below are just two examples of such measures:

> **MM-LU50:** Local jurisdictions can and should reduce required road width standards whenever feasible to calm traffic and encourage alternative modes of transportation.
>
> **MM-LU85:** Local jurisdictions can and should reduce heat gain from pavement and other hardscaping, including:
>
> - Reinstate the use of parkway strips to allow shading of streets by trees;
> - Include shade trees on south- and west-facing sides of structures;
> - Include low-water landscaping in place of hardscaping around transportation infrastructure and in parking areas;
> - Install cool roofs, green roofs, and use cool paving for pathways, parking, and other roadway surfaces;
> - Establish standards that provide for pervious pavement options:
> - Remove obstacles to xeriscaping, edible landscaping and low-water landscaping.

These measures call for reduced street rights-of-way and road pavement widths, which may compromise the "levels of service" traffic standards applicable to street segments, which oftentimes are used as significance criteria in evaluating a project's traffic impacts. For example, in downtown areas, reduced street widths may be recommended to enhance pedestrian accessibility, but, in doing so, the road segment can no longer operate at the required "level of service," without creating significant traffic impacts (*e.g.*, congestion, delay). The Draft PEIR did not disclose these potentially significant impacts prior to public circulation. Because such measures are beyond SCAG's limited jurisdiction and authority, and because the Draft PEIR did not disclose impacts associated with such mitigation measures, the SCAG Regional Council should reject such measures on infeasibility grounds.

20. Also, other Draft PEIR proposed mitigation measures state that local jurisdictions, project sponsors, or other agencies will "ensure" that certain environmental outcomes are achieved, or "shall minimize impacts" to various environmental conditions. In fact, the Draft PEIR contains about 100 measures directing that such agencies "ensure" or minimize various environmental minimization measures (see, for example, MM-AV11-12; MM-AQ3-13; MM-BIO-9, 11, 13-14, 17-18, 20, 29-31, 35, 47; MM-CUL12-13; MM-GEO1-9; MM-HM5, 7-8, 14; MM-LU15, 23, 58, 63, 67, 70, 75, 79; MM-NO10-11; MM-PS1-3, 12-13, 36, 55, 70, 77; MM-TR21, 33, 41, 56-57, 81; and MM-W5, 9, 15-16, 18, 26, 29, 31, 36, 46, 47, 60, 62, and 65). The problem, however, is that SCAG lacks the jurisdiction and legal authority to be able to "ensure" impacts are mitigated or minimized. SCAG can offer assistance; it can be a forum for cooperative decision-making by its member agencies; and it can encourage mitigation/ minimization; but, SCAG lacks the jurisdiction or legal authority to direct or mandate the outcome of many of the mitigation proposed in the Draft PEIR.

21. Although the above comments relative to mitigation measures are critical of the proposed mitigation measures in the Draft PEIR, it does not mean that SCAG is completely constrained from adopting appropriate and feasible mitigation measures. For example, an appropriate mitigation relative to the water quality impacts identified in the Draft PEIR may be as follows:

> "The implementing agency should conduct or require project-specific hydrology studies for projects proposed to be constructed within floodplains to demonstrate compliance with applicable federal, state, and local agency flood-control regulations. These studies should identify project design features or mitigation measures that reduce impacts to either floodplains or flood flows to a less than significant level. For the purposes of this mitigation, less than significant means consistent with federal, state, and local regulations and laws related to development in the floodplain."

This measure was taken from the Sacramento Area Council of Governments (SACOG) Draft PEIR for the SACOG 2035 proposed Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) for the SACOG region, which is found at http://www.sacog.org/2035/2011/11/draft-environmental-impact-review-released/ and incorporated by this reference. Unlike SCAG's Draft PEIR proposed mitigation measures, the measure taken from the SACOG Program EIR appropriately defers to the implementing agency with jurisdiction; it

contains performance standards based on compliance with applicable federal, state, and local agency flood-control regulations; and it recommends project design features or mitigation measures to reduce impacts to floodplains or flood flows to less-than-significant levels. It does so without SACOG exceeding its jurisdiction or mandating outcomes without the legal authority to do so. These SACOG mitigation measures should be considered in lieu of all of the proposed "can and should" mitigation measures contained in SCAG's Draft PEIR.

22. In both the Executive Summary and Section 4.0, Alternatives, the Draft PEIR summarizes and evaluates three alternatives to the proposed project. These comments focus on "Alternative 3," also called the "Envision 2 Alternative." In summary, according to the Draft PEIR, the Envision 2 Alternative "includes far more aggressive densities than the 2012-2035 RTP/SCS, especially around High Quality Transit Areas (HQTAs), increases mobility, reduces emissions, and limits the development of single-family housing that would be built in the region. The Envision 2 transportation network is similar to the Plan network with minor changes to goods movement and transit projects. The growth network associated with Envision 2 maximizes urban centers, TODs [transit-oriented development] and HQTAs; it also includes a more progressive jobs/housing distribution optimized for TOD and infill." (Draft PEIR, p. ES-3.)

First, the Draft PEIR made a preliminary determination that this alternative was "feasible" for evaluation purposes. However, the SCAG Regional Council retains the discretionary authority to reject the alternative as infeasible based on legal and policy considerations, and because it does not meet the proposed project's objectives. We ask that the SCAG Regional Council adopt such findings.

Second, the Draft PEIR states that the Envision 2 Alternative includes "far more aggressive densities" than the proposed project. Please clarify whether the alternative includes "far more aggressive densities" than those found in SCAG's member agencies' adopted general plans. We ask for this clarification because it appears that the alternative, in fact, proposes "far more aggressive" densities and intensities than found in the local general plans or cities and counties within the region. If so, then the alternative conflicts with those adopted general plans, which is a permissible factor in rejecting the alternative.

Third, because SCAG does not have any legal jurisdiction to govern the land use decisions of its member cities and counties (see Gov. Code, § 65080(b)(2)(K)), SCAG lacks the legal authority to require the elected decisionmakers of cities and counties to adopt or amend their respective land use policies, including their general plans and zoning ordinances, which would be required to implement the alternative's forecasted land use patterns. Accordingly, SCAG lacks the jurisdiction and legal authority to implement the alternative's "aggressive" development pattern. This ground also is a permissible basis for the SCAG Regional Council to reject the Envision 2 Alternative.

Fourth, the Envision 2 Alternative increases densities and intensities in developed or previously-developed urbanized areas within the region. The increased densities/intensities are "especially around" high quality transit areas, urban centers, transportation corridors, and transit-oriented developments. More specifically, the alternative, if adopted, would increase

population adjacent to transportation/transit facilities when compared to the proposed project. Please confirm.

Finally, the Envision 2 Alternative proposes to eliminate single-family development. We encourage the SCAG Regional Council to reject this alternative because the elimination of single-family development is both beyond SCAG's legal jurisdiction and not desirable from a policy perspective as it would eliminate an important part of the mix of housing to be provided by the adopted general plans within the region.

23. The Draft PEIR fails to adequately address the environmental impacts attributable to the densification and intensification of land use development. For example, Section 4.0, Alternatives, of the Draft PEIR does not accurately or fully capture the environmental impacts of the Envision 2 Alternative.

While not described in the Draft PEIR, increased density and intensity often can tax existing public services infrastructure and trigger the need to upsize water mains, sewer lines, etc. -- such activities can result in significant environmental impacts. Also, as compared to the proposed project, the Envision 2 Alternative would appear to result in higher cancer risks for 4 of the 8 corridor segments modeled in the Draft PEIR, not "2 of the 8 corridor segments modeled. (See Draft PEIR, p. 4-31 and compare to Table 4-16, which suggests that the cancer risk based on residential exposure to vehicle operation under Envision 2 is greater for I-8 in Imperial; SR-91 in Riverside; U.S. 101 in Ventura; and I-15 in San Bernardino).) Similarly, please confirm whether Envision 2's residential densities in closer proximity to transportation/transit facilities give rise to greater air quality impacts, including cancer risks and other health concerns, when compared to the proposed project.

In summary, the Draft PEIR needs to be revised to reflect the impacts of densification and intensification.

* * * *

February 14, 2012

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

Re: Draft 2012 Regional Transportation Plan

Dear Mr. Ikhrata:

On behalf of the Burbank-Glendale-Pasadena Airport Authority (Authority) let me first state that we greatly appreciated the opportunity to work directly with members of your staff in the development of the Aviation and Airport Ground Access element of the Draft Regional Transportation Plan (RTP). We have been active members of the Aviation Technical Advisory Committee and provided both technical and policy comments during development of the RTP. We are pleased that many of our comments we have provided during development of the RTP have been incorporated into the RTP technical attachment entitled: "Aviation and Airport Ground Access."

An important concern with the "Aviation and Airport Ground Access" report is the assumption that the projected annual passenger demand for Bob Hope Airport (BUR) would be 9.4 million annual passengers (MAP) by the year 2035. In the November 9, 2011 response written by Mike Armstrong to our October 4, 2011 letter (attached), SCAG took exception to our belief that the more realistic assumption would be passenger demand of 8 MAP or less for Bob Hope Airport in 2035.

SCAG cites the assumed "constraint" of a 78.9 MAP Settlement Agreement at LAX as the driver for this additional passenger demand at BUR. We do not concur with that assumption. Specifically, the passenger cap at LAX is not a legally-enforceable access restriction. Instead, it is a trigger for LAWA to reduce the number of available air carrier gates. The carriers have shown that they have the capability to increase operational efficiencies utilizing aircraft fleet mix, scheduling, and available gate capacity. As such, if a reduction in the number of gates did occur, carriers could process more than 78.9 million passengers annually.

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While the carriers at BUR primarily handle domestic flights now and will continue to do so in the future, it is reasonable to expect that the carriers at LAX will structure their operations and alliances in such a way as to accommodate the transfer of a continually-increasing number of international passengers, regardless of the gate constraints they may face.

The Authority is currently underway with a new Part 150 Study, in which a new forecast of passenger demand will be prepared. We believe that this study will validate our earlier assumption that passenger demand in 2035 will be less than 8 MAP. That forecast will be based on the econometrics of forecasted population growth, business growth, and per capita income within the BUR catchment area, and within the larger region as a whole. That forecast will not be based on assumptions about constraints at LAX. We ask that this change in assumption be also reflected in the RTP.

During this process we also worked closely with OLDA in addressing the designation of the Northern Corridor as a part of the "Constrained Project" list in the RTP.Recently, OLDA transmitted a letter to you dated February 7, 2012 signed by Mr. Frank J. Quintero, Chairman of the OLDA Board and a member of the Airport Authority Board of Directors. We would like to affirm our support for the comments contained in the February 7th communication. We strongly agree that the adoption by the SCAG Regional Council and the Metro Board of Directors of the high speed rail project-related Memorandum of Understanding with the California High Speed Rail Authority is a significant policy development which should be reflected in the RTP adopted by the Regional Council. We also support Metro's Antelope Valley Line Infrastructure Improvement Strategic Plan and hope preliminary results from the study can be incorporated into the RTP.

We appreciate your help in the Authority's effort to improve regional connectivity to the Bob Hope Airport.

Very truly yours,

Dan Feger
Executive Director

Attachment, October 4, 2011 letter to SCAG

October 4, 2011

Mike Armstrong
Southern California Association of Governments
818 W 7th Street, #1200
Los Angeles, CA 90017-3435

Re: Bob Hope Airport

Dear Mike:

This letter follows up on the SCAG Aviation Technical Advisory Committee Meeting on September 22nd at the Bob Hope Airport. At that meeting, the committee discussed, among other topics, SCAG's preliminary projection for passengers likely to use the Bob Hope Airport through the year 2035. SCAG's projection for the Bob Airport is 9.4 MAP.[1]

The problem with SCAG's preliminary projection for the Bob Hope Airport is that it fails to adequately take into account the fundamental economic change that has occurred in the Bob Hope Airport catchment areas in recent years and thereby dramatically over estimates future use. Plainly stated, the level of passengers using the Bob Hope Airport has fallen back to 1993 levels (roughly 4.3 MAP). Any projection that assumes a return to the growth rate of the bubble economy is we believe misleading. Instead, the Bob Hope Airport believes that for a more reliable metric of future growth is the historical growth rate the Airport has experienced fairly consistently over the past 50 years. That growth rate, approximately 1.8% per year, results in a projected passenger level for the Airport in 2035 of roughly 8 MAP, not the 9.4 MAP in SCAG's current projection. We would request that this adjustment be made.

Sincerely,

Mark Hardyment

cc: Tom Ryan

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[1] SCAG's 2035 projection for the Bob Hope Airport is the same under both its low growth (130 MAP for Southern California Aviation) and high growth (164 MAP for Southern California) projections.

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Transportation
Paul Glaab, Laguna Niguel

November 9, 2011

Mr. Mark Hardyment
Director of Environmental Programs
Bob Hope Airport
2627 North Hollywood Way
Burbank, CA 91505

Re: Bob Hope Airport Air Passenger Demand Forecast

Dear Mark:

We very much appreciate your letter of October 2, 2011 commenting on SCAG's 9.4 million air passenger (MAP) demand forecast for Bob Hope Airport in 2035. This forecast was adopted for SCAG's 2008 Regional Transportation Plan (RTP) and has been recommended by the SCAG Aviation Technical Advisory Committee (ATAC) for SCAG's 2012 RTP. It is based on a capacity analysis of Bob Hope Airports 14 aircraft gates/parking positions. We recognize that, like most other airports in the regional system, Bob Hope Airport has seen stagnant or declining passenger growth over the last several years, mainly as a result of the severe economic recession and restructuring of the airline industry. Our recommended regional air passenger demand forecast does not assume that these conditions will persist; nevertheless, at 145.9 MAP in 2035, with a 2.5% annual growth rate, it is considerably more conservative than the 165.3 MAP forecast adopted for SCAG's 2008 RTP. It is also more conservative than the FAA's most recent National Aerospace Forecast (3.2% annual air passenger growth rate) or most recent Terminal Area Forecast for air carrier airports in the region (3.0% annual air passenger growth rate).

It is very important to recognize that the fundamental driver that causes Bob Hope Airport to reach its estimated 9.4 MAP capacity constraint by 2035 is the 78.9 MAP Settlement Agreement passenger constrained at LAX that is assumed by the forecast. With LAX held at that level, and with Long Beach Airport also held to its legally-enforceable 4.2 MAP constraint, Bob Hope Airport becomes a superior and convenient airport alternative for serving future domestic air passenger demand in Los Angeles County within its 9.4 MAP capacity constraint. This reflects a fundamental problem of our regional aviation system, which has a relatively large number of airports serving demand in urban centers of Los Angeles and Orange Counties, but which are all relatively small, highly encroached and ultimately capacity-constrained. Meeting the 145.9 MAP forecast will require Ontario Airport to reverse its steep passenger decline and grow from its current 4.2 MAP to 30.7 MAP over the next 25 years. This will present significant ground access challenges in allowing un-served air passengers in Los Angeles and Orange counties to access available airport capacity at Ontario Airport and other airports in the Inland Empire.

At its last meeting on October 27, ATAC approved the 145.9 MAP air passenger demand forecast with its allocation of 9.4 MAP to Bob Hope Airport, but only with a number of caveats. These include the caveat that the forecast is based on a number

of variables that history has shown can change significantly over time, and it is important to update the forecast on an ongoing basis, most importantly for the next (2016) RTP. Also, that the relaxation or elimination of the settlement agreement constraints at LAX and John Wayne airports could significantly impact forecast allocations of aviation demand at other airports in the regional system, and future updates of the forecast should incorporate any new information provided by local airport authorities on revised constraints at capacity-constrained airports.

I hope that the above information addresses your concerns about the 9.4 MAP air passenger forecast for Bob Hope Airport that has been recommended for SCAG's 2012 RTP. Please let me know if you have any other comments or questions about this issue.

Best regards,

Michael Armstrong

Michael Armstrong
Aviation Program Manager
Southern California Association of Governments

cc: Dan Foger
Executive Director, Bob Hope Airport

State of California • Natural Resources Agency
Edmund G. Brown Jr., *Governor*
DEPARTMENT OF PARKS AND RECREATION
Ruth Coleman, *Director*
Inland Empire District ▪ 17801 Lake Perris Drive ▪ Perris, CA 92571
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February 14, 2012

Jacob Lieb
Southern California Association of Governments
818 West Seventh Street, 12th 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

State of California—Health and Human Services Agency
California Department of Public Health

RON CHAPMAN, MD, MPH
Director & State Health Officer

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

Center for Chronic Disease Prevention and Health Promotion, 1616 Capitol Avenue, Suite 74.420, Sacramento, CA 95814
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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.[1,p21] 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[2] 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.[3-7] 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.[5]

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.[8] 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.

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February 14, 2012

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

RE: Draft FY 2012 RTP/SCS AND DRAFT PEIR
SCH # 2011051018

Dear Mr. Ikhrata:

The California Department of Transportation (Department) wishes to thank the Southern California Association of Governments (SCAG) for the opportunity to review and comment on the Draft 2012 RTP/SCS and Draft PEIR. The Caltrans' review has found that the RTP/SCS has fulfilled all the requirements of the Caltrans' 2010 RTP Guidelines, pursuant to California Government Code Section 14522.

The Department commends SCAG for reaching out and engaging the State, regional, and local agencies and the public in extensive outreach efforts and for developing a comprehensive planning process that included Departmental staff on several committees.

The 2012 Draft RTP/SCS was distributed to the Department Divisions in Sacramento and Districts 7 (Los Angeles and Ventura Counties), 8 (San Bernardino and Riverside Counties), 11 (Imperial County) and 12 (Orange County). The offices within each Division and District were given the opportunity to review and comment on the document according to the California Regional Transportation Guidelines.

Caltrans compliments SCAG on developing strategies that will allow the region to not just meet but to actually exceed the GHG emission reduction goals mandated under SB 375. This Draft RTP/SCS is commendable for its broad vision, which, while recognizing mobility as a primary goal, also encompasses sustainability, the economy, employment, air quality, greenhouse gas (GHG) emission reduction, safety, public health, and integrated planning.

The Department offers the following comments for your consideration:

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/m3) to 0.01 ppm (26 ug/m3). 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.

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,

JAMES J. McCARTHY
Deputy District Director
Division of Planning, Public Transportation and
Local Assistance

cc: William A. Mosby, D8
Bill Figge, D11
Pat Landrum, D11
Ryan Chamberlain, D12
Ron Kosinski, D7
Garth Hopkins, ORIP
Dara Wheeler, ORIP
Kathleen McClaflin, DMT

Hasan Ikhrata
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. Ikhrata:

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

Program Element (Page #)	Implementing agency identified?	Funding identified?	Timeframe identified?	Authority to implement identified?
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."[1] These strategies include a number of "zero or near-zero"[2] 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.[3]

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.*
>
> - *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.*
> - *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.*
> - *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*

[1] SCAG, draft 2012 RTP/SCS, page 74, December 2011.
[2] 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.
[3] 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.

- *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.

<u>Catenary Electric</u>

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,"[4] The Railroads believe that pursuing these technologies prematurely will have the opposite effect.

In a previous submission to SCAG[5], the Railroads outlined other questions which remain unanswered:

[4] SCAG, draft 2012 RTP/SCS, Goods Movement appendix, page 12, Table 1.1, December 2011.
[5] 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."[6]

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 NOx, 0.16 tons of $PM_{2.5}$, and 4,000 tons of CO_2 emissions daily. Full electrification of the rail system, though still a concept at this point, would remove comparable amounts of NOx, $PM_{2.5}$, and CO_2. *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

[6] 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

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

	Buffer for demographic analysis	**Compares baseline vs. plan scenarios?**	**Overlays cancer risk with source?**	**Identifies changes in pollutant exposure?**
Highway Impacts Section	* 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
Rail Impacts Section	* 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.

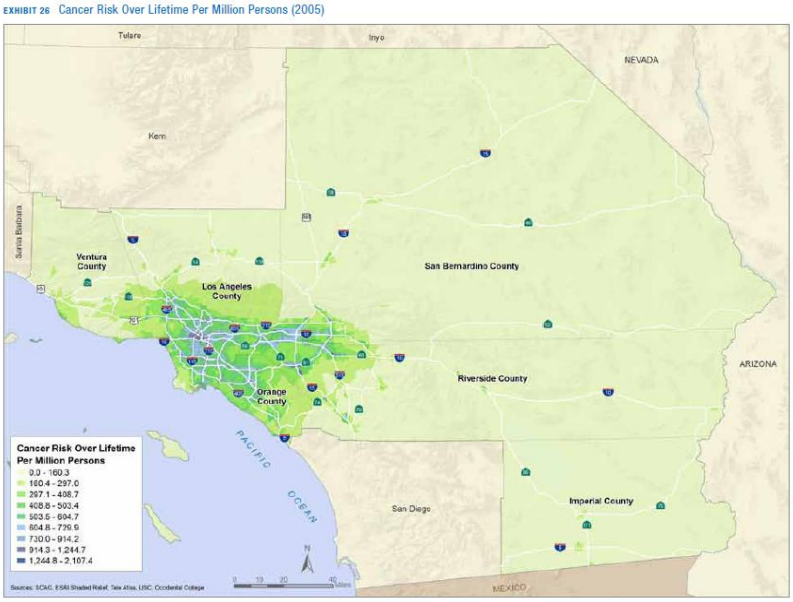
Second, SCAG vaguely describes this map as an "overlay." If the data reflecting the areas of high cancer risk on the map in Exhibit 34 is the same data used to generate the regional cancer risk map in Exhibit 26, then the cancer risk was generated at the regional level, and is therefore not directly 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.[7]

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

[7] 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

***Recommended Mitigation for Rail Related Impacts*, Environmental Justice appendix (Page 148)**	***Goods Movement Environmental Strategy*, RTP (Page 74)**
• *Accelerated Introduction of Cleaner Line-Haul Units* • *Construct sound reducing barriers between noise sources and noise-sensitive land uses* • *Improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise* • *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.*	Near Term • *Upgrading switcher locomotive engines* • *Continued investments into improved system efficiencies*
	Long Term • *Critical steps toward phased implementation of a zero-emission or near zero-emission freight system*

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[8] 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

[8] 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?

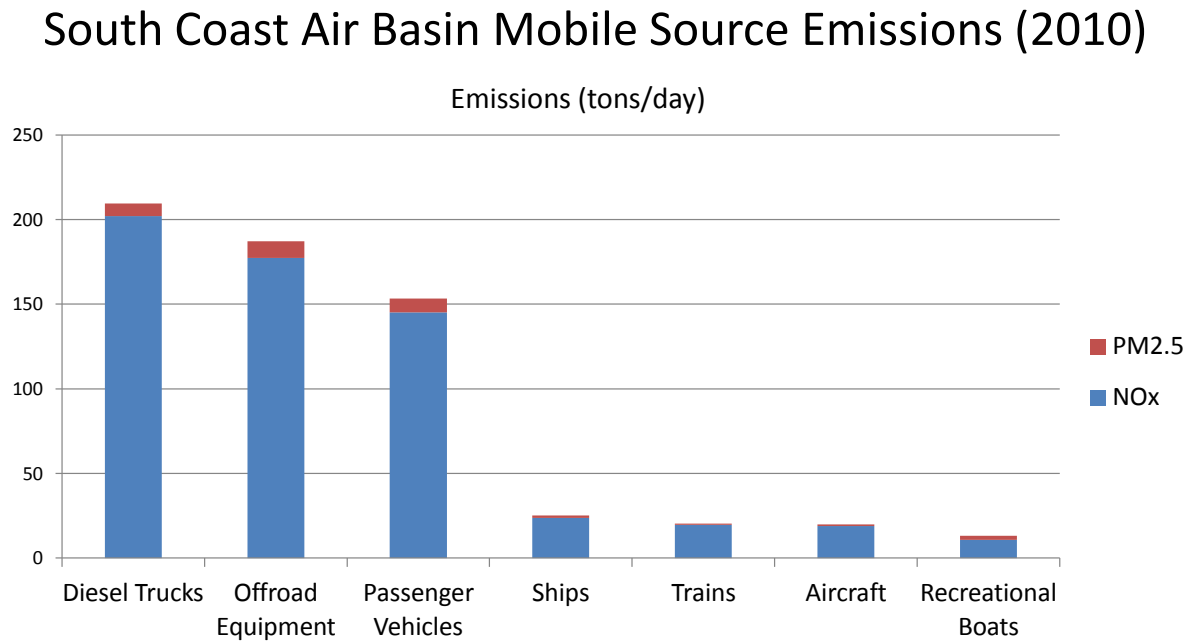
In 2010, ARB estimates locomotives contributed less than one percent of $PM_{2.5}$ emissions and less than three percent of NOx emissions in the South Coast Air Basin (see Figure 4 below). As a point of comparison, other mobile sources such as passenger vehicles, off-road equipment (e.g. farm and construction), and diesel trucks in the South Coast Air Basin contribute roughly 20%, 24%, and 27% of NOx, and 8%, 10%, and 7% of $PM_{2.5}$, respectively.[9] 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

[9] 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.[10] 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)



	Diesel Trucks	Off-road Equipment	Passenger Vehicles	Ships	Trains	Aircraft	Recreational Boats
% SCAB PM2.5	7 %	10%	8%	3 %	>1%	>1%	2%
% SCAB NOx	27 %	24%	20%	1 %	3%	3%	1%

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

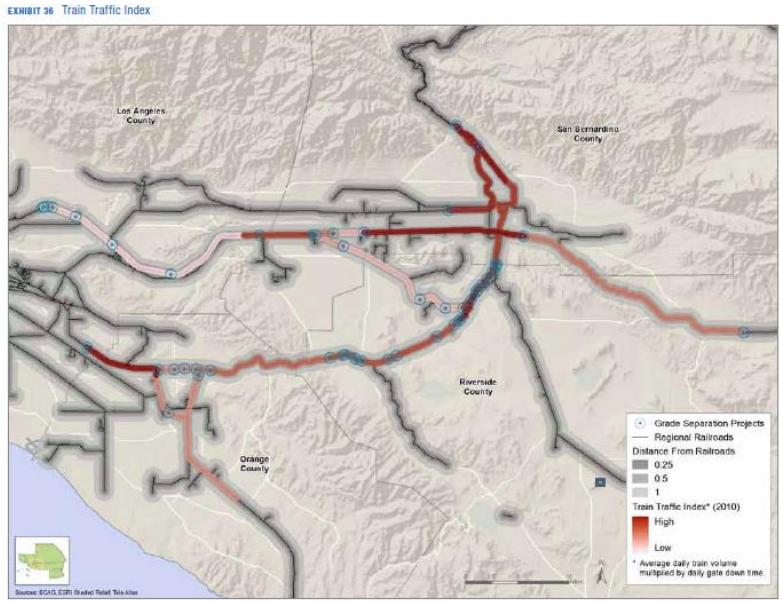
Page 145 Environmental Justice appendix:

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

[10] 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,[11] SCAG should show relative improvement gained through completion of Colton Crossing and other near-term grade separations.

[11] SCAG, draft 2012 RTP/SCS, Project List appendix, page 313, December 2011.

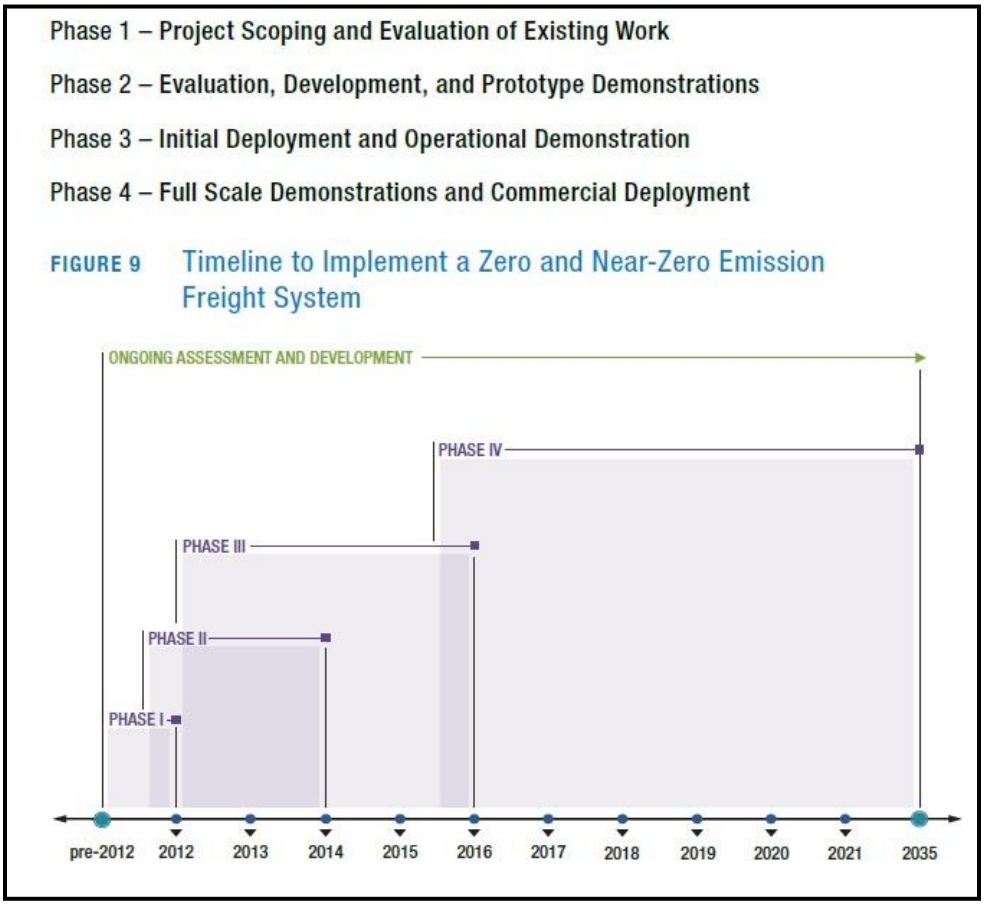
Furthermore, SCAG provides no information that the "total gate down time of two grade crossings located at both ends of the segments" has been correlated to traffic counts on the streets with the gates down. Without the traffic counts or the time of day data, SCAG can draw no conclusions about the correlation 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."*[12]

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*[13] for more information on the timeline to implement an electrified freight rail system in Southern California.

[12] SCAG, draft 2012 RTP/SCS, Goods Movement appendix, page 35, December 2011.
[13] 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

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	▪ Incorporate "footprint" and planning for wayside power into expansion of rail lines in financially constrained 2012 RTP ▪ Incorporate funding to support rail evaluation and demonstration efforts into financially constrained 2012 RTP ▪ 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)
2012–2014	SCAG, with AQMD/ARB on SIP	▪ Evaluate and determine practicability of applying existing electrified rail technologies to region (by 2013) ▪ Evaluate potential funding and implementation mechanisms for zero and near zero emission locomotives, and wayside power, including: ▪ Private (railroads); federal, state, local government; public-private partnerships; electric utility
2015–2016	SCAG, with AQMD/ARB on SIP	▪ If existing electrified rail technologies are determined practicable for the region, identify technologies, infrastructure, and implementation mechanisms in RTP amendment and next major SIP

2018–2020	SCAG, with AQMD/ARB on SIP	▪ 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
		▪ If wayside power is needed, incorporate "footprint" and planning for wayside power into rail lines into 2020 RTP and next major SIP
		▪ Incorporate recommendations regarding type of funding and implementation mechanisms into constrained RTP and next major SIP, including:
		  ▪ Strategy description and timeframe for any rules
		  ▪ Strategy description, potential funding sources and timeframe for any incentives.

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.*"[14] 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 $PM_{2.5}$ 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 $PM_{2.5}$ 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 $PM_{2.5}$ emissions by 1–3 percent.*

[14] 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)

	NO_x			$PM_{2.5}$			CO_2		
Year	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)

	NO_x			$PM_{2.5}$			CO_2		
Year	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…"[15]

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.

[15] 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

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

CALIFORNIA
CEA ENVIRONMENTAL
ASSOCIATES

To: Annie Nam, SCAG

From: Max Pike & Kirk Marckwald

CC: Sarah Weldon

Date: 9/2/2011

Re: Draft Electrification Briefing Papers

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 if you have any questions or comments.

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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).[1] 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

Route	Conceptual Design	Preliminary Engineering/ Environmental Review	Final Design	Advertise, Bid & Award	Construction	Functional Testing/ Start up	Total
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.

[1] 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

Route	Project Definition, Conceptual Design, Railroad and Utility Agreements, Access Rights, Regulatory Approvals, Funding Plan & Funding Commitments[2]	Environmental Studies & Documentation	Final Design, Bid & Award	Construction Time & Final Testing	Total
Railroads' 2011 Projection for all 3 Rail Lines	3[3]	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[4] and the projected emissions reduction benefits would not be realized until that date.

[2] 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.
[3] If funding commitments are not achieved by the third year, the project will slip a corresponding number of years.
[4] 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).[5]

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

[5] 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.[6] 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	**3 hours 40 minutes**

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

[6] 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.

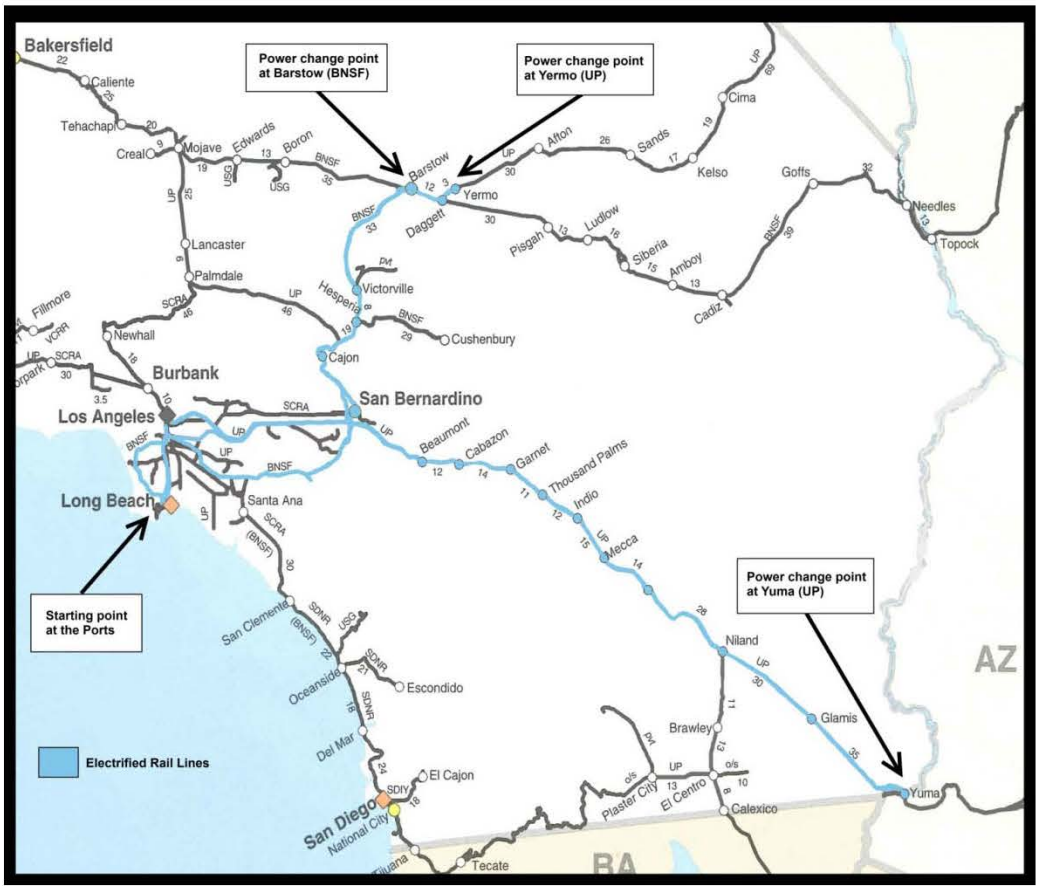
In summary, even though there could modest air quality benefits that could be achieved earlier from a sequential development approach, such an approach creates a number of significant operational and economic hurdles, including the need for additional land, additional ready tracks, intermediate locomotive 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[7]



[7] Base map from Professional Railroad Atlas of North America.

Dual Mode Freight Locomotives

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.[8] 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.

[8] 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[9]

Parameter	Traditional Diesel (Tier 2)[10]	Dual mode (ALP45DP)[11] (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)

[9] 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.
[10] http://www.getransportation.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.
[11] 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."[12] 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.

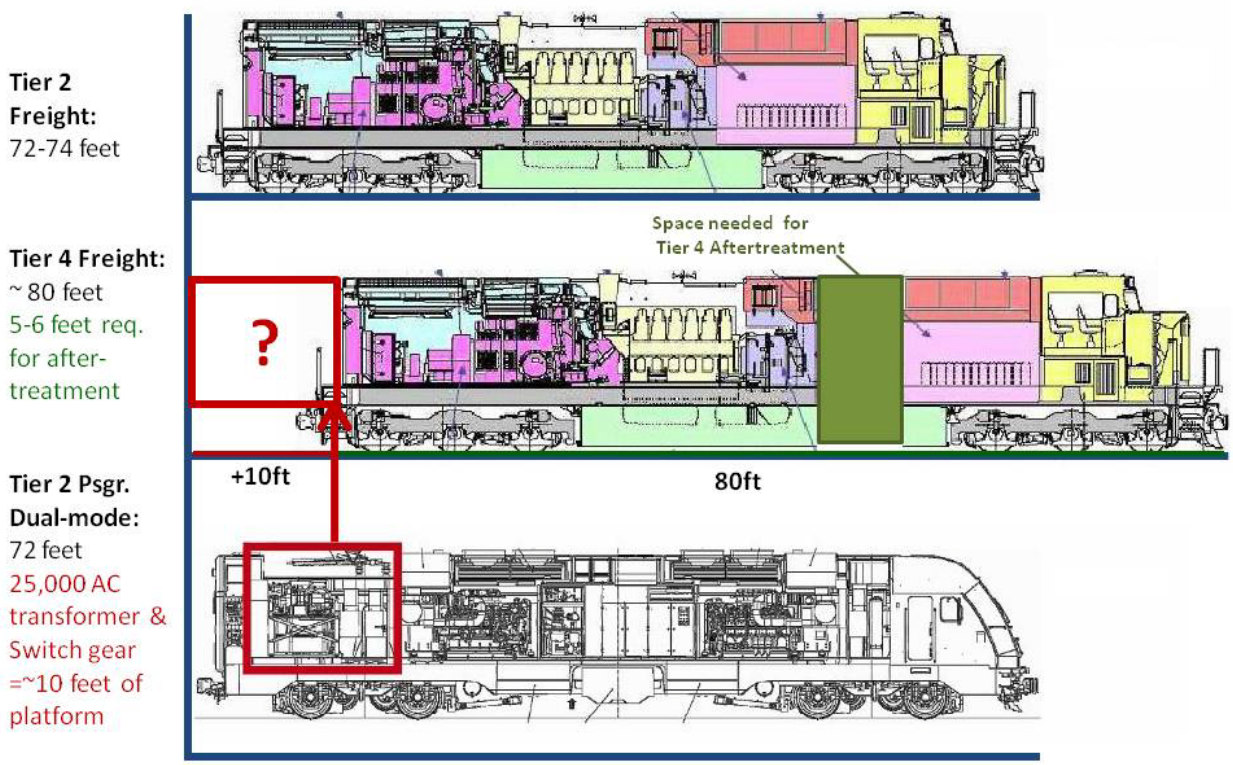
The second compromise may be in the step-down transformer used in the ALP45DP, which is much smaller and lighter than comparable transformers (of similar voltage and power rating) used in Amtrak electric locomotives. This dual-mode transformer operates at a higher cooling oil temperature in order to 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

[12] 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.[13] 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

[13] Interview with Michael Iden, General Director Car & Locomotive Engineering, Union Pacific Railroad, August, 2011.

operations or lighter passenger trains designed for higher speeds.[14] While newer, "high powered" (i.e., greater than 4,000 hp) dual-mode locomotives are available today,[15] 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.[16]

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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[14] 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/

[15] .These newer dual-mode passenger locomotives are currently being delivered to and used in New Jersey and Montreal.

[16] http://www.ble272.org/09-03-25%20Transprotation-Safety%20Presentation.pdf

Similarities between Existing Electrified Rail Systems and a Possible System in Southern California

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,[17] 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,[18] and on approximately 530 miles of the Goonyella system that began operations in 1985.[19]

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.[20] 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.[21]

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.[22] 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

[17] 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

[18] 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

[19] 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

[20] Synergies Economic Consulting. "Review of AT5; The Case for Network Wide Pricing." April 2008.

[21] Queensland Competition Authority. "QR Network's 2010 DAU - Tariffs and Schedule F." June 2010.

[22] http://www.reuters.com/article/2011/08/18/bhp-rail-idUSL3E7JI0BI20110818

commodities are coal, oil and oil products, and wood products.[23] 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. [24]

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).[25]

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

[23] Mote, Victor, "Trans-Siberian Railway." Encyclopedia of Russian History. 2004. *Encyclopedia.com.* (August 19, 2011). http://www.encyclopedia.com/doc/1G2-3404101396.html

[24] Interview with Mike Iden of Union Pacific Railroad, July 2011.

[25] Black Mesa & Lake Powell Railroad is owned by the Salt River Project and the co-owners of the Navajo Generating Station; Desert Power Railroad is owned by Deseret Generation & Transmission Company.

that span much of the United States.[26] 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.[27]

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.[28] 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

[26] BNSF operates in 23 states and UP operates in 28 states.

[27] 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.

[28] Caltrain 2025 Electrification. 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 l 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**
Public subsidies: initial or ongoing public funding	None proposed to date	Publically funded	Publically funded	Utility reimbursed by ratepayers	Utility reimbursed by ratepayers	Public funding
Ownership: private or public when electrified?	Private	Public	Public	Private Utility	Private Utility	Public
Retrofitting an existing diesel line vs. construction of a new electric system	Retrofit	Retrofit	Retrofit	New	New	Retrofit
Locomotive exchange at connection to larger rail network	Yes, multiple	Yes, multiple (change in voltage)	Yes	No	No	No
Type of materials transported	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

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.

California Natural Gas Vehicle Coalition • 1029 K Street, Suite 24 • Sacramento, CA 95814
Phone: (916) 448-0015 • Fax: (916) 448-7176

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,

Tim Carmichael
President

CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

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February 14, 2012

VIA ELECTRONIC SUBMISSION

Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017
rtp@scag.ca.gov

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

Dear Sir or Madam:

California Rural Legal Assistance, Inc. (CRLA) submits the following comments on the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) on behalf of José Saldívar, a farmworker who has lived and worked in the Eastern Coachella Valley for almost forty years, and other low-income residents of the Eastern Coachella Valley. CRLA is a non-profit legal services organization that provides legal representation to low-income residents of rural California, including in many communities comprised primarily of farmworkers and their families. Within the SCAG region, CRLA provides services in the Eastern Coachella Valley, Imperial County, and Ventura County.

Promotores Comunitarios del Desierto (PCD) is a community-based organization working with residents of the Eastern Coachella Valley to empower them to voice their concerns in issues such as health access, infrastructure, and environmental justice, serving as a bridge between agencies and residents.

El Sol (El Sol) Neighborhood Educational Center is a non-profit agency serving San Bernardino and Riverside Counties since 1991. El Sol provides prevention and early intervention services in the areas of mental health, nutrition, and post-partum depression, as well as offering classes in computer literacy and English as a Second Language. El Sol works in the "Promotores de Salud" model, utilizing different strategies of community outreach such as community organizing and popular education.

Pueblo Unido Community Development Corporation (PUCDC) is a non-profit organization that responds to the needs and concerns of underrepresented rural communities of the Eastern Coachella Valley through actively engaging and fostering collaborative efforts among residents and other stakeholders to find viable solutions, leverage critical resources, and bring new opportunities to improve the quality of life for residents.

Comité Cívico del Valle (CCV) is a non-profit organization serving Imperial County and the Eastern Coachella Valley. CCV's mission is to improve the living conditions of its communities through education, capacity-building, and civic participation with the vision of living in healthy, prosperous, and informed communities.

We commend SCAG for the detailed preparation and analysis evident in the draft RTP/SCS and accompanying documents. Transportation planning for a region of SCAG's size and diversity is a challenging endeavor. The draft RTP/SCS shows an impressive commitment not only to addressing the region's transportation needs but also to fulfilling the new requirements of SB 375. However, we have some concern that the draft RTP/SCS does not make adequate provision for the unique circumstances of rural communities in the SCAG region, particularly the low-income rural communities that house the region's agricultural workforce. We offer the following comments in an effort to ensure that SCAG will adopt a final RTP/SCS that addresses the needs of low-income rural and farmworker communities.

<u>We recommend that SCAG add an RTP goal focused on equitable distribution of the benefits and burdens of the RTP/SCS.</u>

The draft RTP/SCS includes a list of RTP Goals, set forth on p. 13 and correlated with performance measures as described on p. 15. The RTP Goals address a number of key concerns such as safety, air quality, goods movement, and facilitation of transit and active transportation. However, the RTP Goals included in the draft RTP/SCS fail to address issues of equity, either on a socioeconomic axis (equitable distribution of burdens and benefits across socioeconomic categories) or on a geographic axis (equitable distribution of burdens and benefits throughout the diverse communities of the SCAG region). Given the size and diversity of the SCAG region, it is unlikely that such equity will be achievable unless it is made a primary goal of the RTP/SCS and explicitly considered at each step of the RTP/SCS development process. We recommend that SCAG add an RTP Goal incorporating these two axes of equity. The majority of our remaining recommendations would support the incorporation of such a goal into the fabric of the entire RTP/SCS.

<u>We recommend that SCAG further the farmland preservation goal of SB 375 by actively planning for the transportation and housing needs of the region's agricultural workforce.</u>

As acknowledged on p. 128 and in Exhibit 4.8 of the draft RTP/SCS, SB 375 requires SCAG to include in the SCS a consideration of resource areas and farmland. <u>See</u> Cal. Gov't Code § 65080 (b)(2)(B)(v). The preservation of productive farmland will necessarily require providing for the

needs of the region's agricultural workforce, including the need for the creation of appropriately sited decent affordable housing – generally at levels affordable to extremely low-income (ELI) households – and transportation options, including transit, that facilitate farmworkers' access not only to their agricultural workplaces but also to human services, children's schools, medical facilities, retail (including full-service grocery stores), non-agricultural jobs for other adult members of farmworker households, and other amenities. In the interest of preserving the region's farmlands, we recommend that SCAG incorporate the consideration of these needs as a component of the consideration required by SB 375.

This recommendation will also further SB 375's broader goal of greenhouse gas reduction by increasing transit accessibility to rural populations, resulting in a reduction of vehicle miles traveled. Like many rural areas in the SCAG region, the Eastern Coachella Valley is severely underserved by transit. Bus service is utterly nonexistent for large portions of the Eastern Coachella Valley population. A few communities in the Eastern Coachella Valley receive bus service, but its utility is significantly diminished by long headways and inconvenient transfers. In order to access the educational and work opportunities of the Western Coachella Valley – where housing costs are unaffordable to the low-income farmworker households of the Eastern Coachella Valley – rural residents must budget up to four hours per day for bus commuting. This level of service creates tremendous obstacles to the use of transit by rural residents, perpetuating a reliance on personal vehicles and excluding residents who cannot afford to use personal vehicles for lengthy commutes. Bus service to such underserved communities should be expanded and improved in the interest of equity, environmental justice, and greenhouse gas reduction.

We specifically recommend that SCAG consider the following strategies:

- Regularly convene planning staff and governmental decision-makers from jurisdictions containing farmland to focus on meeting unmet housing and transportation needs of agricultural workers; ensure that such convenings are informed by input from agricultural workers and/or from community-based organizations familiar with the transportation and planning needs of the agricultural workforce and other rural residents
- Provide technical assistance to member jurisdictions by conducting feasibility analyses of creative transit strategies, such as local circulators in rural communities, to address the unmet transit needs of farmworker families and other rural residents
- Encourage the implementation of farmworker, student, and commuter vanpools in rural areas; provide technical assistance on vanpools by maintaining a library of resources on such topics as project development, financing, outreach, and project administration
- Explore the feasibility of vanpools or similar programs for non-work-related transportation needs such as access to medical facilities, retail, and other services
- Conduct outreach to governmental decision-makers and community groups regarding funding opportunities for expansion and improvement of transit in rural areas

<u>In the interest of mitigating the impacts of gentrification and providing adequate services to</u>

<u>agricultural workers and other low-income rural residents, we recommend that certain of the benefits proposed for HQTAs be made more widely available.</u>

We commend SCAG for its innovative proposals to incentivize growth in high-quality transit areas (HQTAs). However, as is noted at various points throughout the draft RTP/SCS and the draft Environmental Justice Supplemental Report, there are as-of-yet unanswered concerns about the likelihood of gentrification in HQTAs, as lower-income households find themselves priced out of increasingly desirable housing markets. Thus, certain HQTA-related incentives, such as transit fare discounts, would likely provide greater benefits to higher-income households than to the lower-income households who need such fare relief. Furthermore, certain sectors of the SCAG region's population – such as agricultural workers – do not realistically have the option of living in an HQTA; HQTA incentives should not exclude such households, whose contribution to the region's economy and character are recognized in SB 375's prioritization of farmland resources. In order to enhance the equity of the HQTA incentives proposed in the draft RTP/SCS, we recommend that SCAG consider the following augmentations of those incentives:

- Provide local circulator services in non-HQTAs that are unserved by existing transit services, including rural agricultural communities
- Consider household income, and not solely HQTA residence status, in structuring any transit fare discount(s)

In addition, we note that certain land use and transportation policies could result in the development of more HQTAs than are contemplated in the draft RTP/SCS. This is particularly true in the inland counties of Riverside, San Bernardino, and Imperial, where very low percentages of the population currently have access to high-quality transit but where slight decreases in bus headways could bring existing bus routes within the definition of high-quality transit. Furthermore, we note that some of the HQTAs designated in the draft RTP/SCS appear to be along routes with extremely limited accessibility, such as Interstate 10 serving the Western Coachella Valley. Although such short-headway bus routes are likely to provide high-quality transit to people living at designated stops along the route, it seems highly unlikely that all persons living within the Interstate 10 corridor will realistically enjoy such access. We recommend that the utility and accessibility of HQTAs be extended via the following measures:

- Prioritization of the extension of HQTA status to more communities by decreasing bus headways, particularly in the inland counties of Riverside, San Bernardino, and Imperial
- Close collaboration with community-based groups and with county-level planning staff and governmental decision-makers to increase the feasibility of developing affordable housing in rural areas at a density of twenty dwelling units per acre (for example, through modifying local zoning ordinances to allow densities of twenty units per acre in mobilehome parks located on land zoned for agricultural use), such that these areas could be eligible for HQTA incentives
- Adopt a more flexible density standard for HQTAs in agricultural areas in order to make it feasible for mobilehome parks, which constitute the vast majority of affordable housing in the Eastern Coachella Valley and frequently occur in dense clusters along major thoroughfares, to qualify for incentives such as local circulators and transit fare

discounts

- Ensuring the utility and transparency of the HQTA designation by defining HQTAs based on residents' access to transit stops, rather than solely by proximity to a high-quality transit route

<u>We recommend that SCAG take a leadership role in developing non-regressive funding mechanisms for transportation development.</u>

We applaud SCAG for taking on the difficult question of transportation funding and the ongoing wisdom of relying on existing federal and state gas tax structures, including excise taxes. However, some of the funding mechanisms on which the draft RTP/SCS relies are likely to have regressive and/or inequitable impacts, causing low-income households and communities to bear a disproportionate share of the cost of the region's transportation system. Point-of-sale revenue sources – such as sales taxes, gasoline taxes, and farebox recoveries – indisputably have a regressive impact on households least able to afford them. The projected Vehicle Miles Traveled (VMT) tax seems likely to further the goals of SB 375 by creating incentives for people to live in transit-rich areas close to jobs, services, and retail opportunities. However, given the very real risk of gentrification in such neighborhoods, the VMT is likely to have a disproportionate impact on lower-income households who cannot afford the higher housing costs of desirable urban neighborhoods. Furthermore, as discussed above, SB 375 encourages MPOs to prioritize the preservation of farmland resources. A VMT could undermine this goal by creating an unaffordable burden on farmworker families, who face lengthy commutes not only to the fields and packing houses in which they work but also to medical care, grocery and other retail outlets, schools, human services, and other amenities. Residents of agricultural areas have little access to any form of transportation other than personal vehicles, and the draft RTP/SCS does not propose expanding transit to reduce this burden. Farmworker households should not be penalized for failing to use transit when transit has not been made available to them.

We recommend that SCAG apply its considerable technical expertise to devising and advocating for more equitable mechanisms of transportation funding at the local, state, and federal levels. One possibility might be a VMT tax structured to allow tax credits for lower-income households and/or for other households that are unable to access housing in transit-rich neighborhoods, such as farmworker households. Because a VMT tax cannot be assessed at the point of sale, it is likely to be far more flexible than a traditional gas tax and can therefore be made more responsive to equity concerns.

<u>We recommend that data on the environmental justice impacts of the draft RTP/SCS be disaggregated in order to facilitate analysis of the impacts on disadvantaged communities within the SCAG region.</u>

Significant portions of the draft RTP/SCS, particularly the draft Environmental Justice Supplemental Report (draft EJ Report), analyze data at the regional level. For example, the draft EJ Report summarizes the following data based on its region-wide impacts on specific

income quintiles and racial or ethnic groups: distribution of savings in travel time and distance; accessibility to employment and services; accessibility to parks; exposure to emissions and consequent health risks; and exposure to noise impacts. However, the maps presented in Exhibits 1-14 of the draft EJ Report demonstrate that environmental justice (EJ) populations are not distributed evenly throughout the region; rather, there are pockets where certain EJ variables are extremely concentrated, with disproportionately high percentages of poverty, minority population, foreign-born population, non-English-speakers, and populations without a high school diploma concentrated in communities of extreme disenfranchisement. Such communities include not only urban pockets in and near Los Angeles, but also the agricultural communities of the Eastern Coachella Valley and much of Imperial County. An analysis that examines, for example, emissions exposure encountered by the entire Latino population of the SCAG region fails to address the ways in which burdens of the draft RTP/SCS might or might not be disproportionately visited on localities that struggle under the weight of multiple categories of disadvantage.

In particular, the Eastern Coachella Valley – the population of which is over 97% Latino – appears to realize few benefits under the draft RTP/SCS, giving rise to an appearance of denial of service in this area and perpetuation of historic exclusion. Based on the level of analysis made available by SCAG in the draft EJ Report, it is impossible to determine whether the Eastern Coachella Valley is expected to bear a disproportionate share of the burdens of the draft RTP/SCS, such as increased exposure to emissions and/or noise impacts.

Furthermore, we note that the Environmental Justice Mitigation Toolbox on pp. 147-48 of the draft EJ Report does little to address the specific risks confronted by local EJ communities. While the Toolbox provides a number of suggestions to reduce RTP/SCS-related impacts throughout the SCAG region, its recommendations do not acknowledge the heightened level of exposure to environmental risks that is all-too-frequently visited upon communities of concentrated disadvantage.

In order to minimize the chances that localities of extreme disenfranchisement will disproportionately bear the burdens of – and be deprived of the benefits of – the draft RTP/SCS, we recommend that SCAG take the following steps:

- Use the geographic data in Exhibits 1-14 of the draft EJ Report to identify local EJ communities that are subject to two or more of the categories of disadvantage highlighted in the Exhibits
- Conduct a Performance Area Analysis (similar to the 11-factor Performance Area Analysis set forth in pp. 34-146 of the draft EJ Report) with respect to each of the local EJ communities thus identified
- Monitor implementation of the RTP/SCS to quantify actual impacts on local EJ communities

<u>We recommend that SCAG utilize a more broadly accepted measure of economic disadvantage in conducting its environmental justice analysis.</u>

Throughout the Performance Areas Analysis of the draft EJ Report, SCAG relies on income quintile as a measure of economic disadvantage. However, as indicated on the income quintile table on p. 6 of the draft EJ Report, this measurement is not defined in a way that accounts for differences in household size; a one-person household with an income of $45,000/year falls into the same quintile as a seven-person household with an income of $45,000/year, although these two households face vastly different financial prospects. An analysis conducted on this basis will not yield an accurate measure of economic need.

We recommend that SCAG instead use the measures of Extremely Low-Income, Very Low-Income, Low-Income, Moderate Income, and Above Moderate Income established annually by the California Department of Housing and Community Development based on data provided by the United States Department of Housing and Urban Development. These figures are a broadly accepted measure of a household's relative economic need and are already easily available to SCAG due to its obligations related to the calculation of the Regional Housing Need Allocation (RHNA). An EJ analysis based on these figures will yield a far more accurate portrait of the impacts of the draft RTP/SCS on households of various levels of economic need or privilege.

<u>We recommend that SCAG provide more detailed analysis regarding the expected distribution of air quality impacts of the draft RTP/SCS.</u>

Although we commend SCAG for developing a draft RTP/SCS that will improve overall air quality in the region, we are very concerned to learn that 23-29% of SCAG-region residents are expected to experience worse air quality. The draft RTP/SCS and Supplemental Reports do not clarify which portions of the region are expected to realize the greatest air quality benefits and which will suffer the expected declines in air quality. We recommend that SCAG provide a detailed geographic analysis of the draft RTP/SCS's projected air quality impacts and include this analysis in the EJ Performance Areas Analysis, subject to the revisions of the Performance Areas Analysis recommended above.

We further wish to call to SCAG's attention that rural areas of the Eastern Coachella Valley are currently not subject to adequate air quality monitoring. The air quality monitors maintained by the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley are in urbanized areas of the Valley and do not reflect the air quality of the rural and agricultural areas of the Eastern Coachella Valley, which suffer from high levels of blowing dust (including from traffic over unpaved roads), pesticide sprays, smoke from agricultural burning (often in close proximity to residential areas), and particulates from the drying Salton Sea. We recommend that SCAG aggressively pursue the spirit of transportation conformity by advocating for expansion of air quality monitoring to the Eastern Coachella Valley and to other areas that are subject to unique air quality stressors not detected by SCAQMD's air quality monitors as currently distributed.

* * *

Thank you for your kind consideration of these comments. Should you have any questions

about these comments, please feel free to contact Cristina Méndez (cmendez@crla.org; (760) 398-7261 x 307) or Phoebe Seaton (pseaton@crla.org; (559) 233-6710 x 315).

Yours,

Laura S. Massie
Attorney at Law
California Rural Legal Assistance, Inc.

/s/
Eduardo Guevara
Associate Director
Promotores Comunitarios del Desierto

/s/
Maria de Anda
Desert Region Supervisor
El Sol Neighborhood Educational Center

/s/
Sergio Carranza
Executive Director
Pueblo Unido Community Development Corporation

/s/
Luis Olmedo
Executive Director
Comité Cívico del Valle, Inc.

cc: Phoebe Seaton, Project Director, Community Equity Initiative, CRLA, Inc.
Cristina Méndez, Community Worker, Community Equity Initiative, CRLA, Inc.

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
rjcervantes@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 indentified 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.

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, 12th Floor
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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 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 communites 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

Sincerely,

Ed Amador/Chay Peterson
Canyon Land Conservation Fund
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02-15-12P03:17 RCVD

CENTENNIAL FOUNDERS LLC

Mr. Hasan Ikhrata
Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th 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. Ikhrata:

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

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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

Center for Demographic Research

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
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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. <u>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.</u>

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.

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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	*All chapter headings should include the Chapter number on each page for ease of reference.*
2	Clarification	1, left column	"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, ~~both~~ 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 ensures the region receives its fair share of funding, 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	*Is additional $0.15 gas tax the sum total of both state and federal taxes or $0.15 each?*
5	Clarification	12, right column	"It also demonstrates how we can transition from things we know to be unsustainable over the long term and beyond the term of this RTP—such as reliance on fossil fuels—to new technologies for the future."

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	30, 31, 73	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".
		30, right column	"The RTP/SCS includes the following actions to address energy uncertainty ~~and reduce the region's contribution to global climate change~~:"
		31, right column	"Adaptation ~~Climate change~~ global warming mitigation means reducing or sequestering greenhouse gases, whereas adaptation is preparing for known impacts of ~~climate change~~ global warming. Over the coming century, some ~~climate change~~ 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 ~~will~~ would impact streamflow, flooding, water supply, sea level, and soil water content. These impacts ~~will~~ would affect agriculture, stormwater, wastewater treatment, wildfire risk, roads, forest health, and biodiversity. These impacts ~~will~~ would also have consequences for public health, economic livelihoods, the financial sector, the insurance industry, individual comfort, and recreation. In practice, these impacts ~~will~~ would mean coping with…"
		73, right column	"Goods movement is also a major source of greenhouse gas (GHG) emissions that contribute to global ~~climate change~~ warming."
7	Clarification	40, left column	"Strategic investments, put forth by the private sector, that would remove barriers associated with telecommuting are expected…"
8	Correction	page 42- Table 2.2	241 toll road completion year is 2030
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 during peak periods."

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
11	Clarification	78, right column	"Greenhouse Gases On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total. 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."
12	Clarification	80, left column

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
13	Clarification	page 95- Table 3.3	~~"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."~~ Suggested language is from page 31 of Growth Forecast Appendix: 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
14	Clarification	105, right column	"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 ~~has little~~ raw land available in the region ~~left to accommodate additional growth~~."
15	Clarification	106, last paragraph	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."
16	Clarification	110, right column	"Municipal water and sewer systems, for example, ensure clean water. At the same time, ~~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 hydromodifcation downstream in sections which are not yet engineered and hardened. Many strategies…"
17	Add to glossary	127, right column	"Gentrification"
18	Please clarify	128, left column	"Thus, this adjustment allowed the land use pattern to conform more closely to local ~~expectations~~ general plans, while reducing the amount of vehicle miles traveled." *Whose/What are "local expectations?"*
19	Revise language to clarify	149, right column	Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options. "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which would help ~~can and should undertake in order~~ to successfully implement the SCS."

#	TOPIC	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
20	Revise language to clarify	153, right column	"Evaluation and Revision SCAG will also track its own progress in implementing its RTP/SCS strategies in conjunction with the preparation and adoption of its Overall Work Program and Annual Budget." *Clarify if "its progress" is SCAG's progress or the region's progress.*
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	"…including Los Angeles Ontario Airport, the March Inland Port…" *Should LAX and Ontario airports be named separately?*
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	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). *Please incorporate OCP-2010 Modified into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.*

Table 3. SCS BACKGROUND DOCUMENTATION APPENDIX COMMENTS

#	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 A, B, C Names of Alternatives differ than those listed in the PEIR on pages ES-3 and 1-4. *Please be consistent with naming protocol for alternatives between two/all documents.*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
3	Clarification	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, except in Gateway and Orange County COG subregions per their SCS delegation agreements. Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family ~~hosuing~~ housing."
4	Please define	71, right column	Plan Alternative (B) *Define small lot single family in text*
5	Clarification	71, right column	Plan Alternative (C) "As a result very suburban communities may experience no new housing or employment growth, while some urban areas with very good access to regional transit may experience significant increases in housing or employment growth."
6	Clarification	72, left column	"While each alternative is distinctive, a number of parameters remained constant across each alternative: the regional RTP/SCS forecast total for population, households and jobs;…" "Detailed forecast: the detailed distribution of population, households, and jobs across the region…"
7	Clarification	72, left column	*What does it mean that TAZ boundaries include city boundaries?*
8	Clarification	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, except in Gateway and Orange County COG subregions per their SCS delegation agreements." Add statement to table notes: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
9	Clarification	74, Table D2	Alternatives A & B: Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
10	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." *Please clarify if TAZ is Tier 1, Tier 2, or both.*
11	Clarification	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~~ unchanged and integrated into the alternatives (with possible revisions for Alternative C only)."

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
12	Clarification	80	Alternative A Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
13	Clarification	81	Alternative B Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
14	Clarification	115, left column	Transit Zoning Code Santa Ana 2011 *Is this a duplicate of the 2010 Santa Ana project?*

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 Ikhrata, SCAG
Scott Martin, CDR

Citizens Alliance for Property Rights

January 30, 2012

Susan Kline
President

Alice Eaton
Vice President

Debra Tash
Treasurer
Secretary

Michael Greer
Director

Stuart Kline
Director

David Stewart
Director

Bob Baker
Director

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

Dear Ms. O'Connor:

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

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.

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?

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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

Mr. Hasan Ikhrata, Executive Director
Southern California Association of Governments
818 West 7th Street, 12th 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. Ikhrata,

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

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

City of Anaheim
PLANNING DEPARTMENT

February 14, 2012

Mr. Hasan Ikhrata, 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. Ikhrata:

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.*

<u>California High-Speed Rail Authority (CHSRA) Project</u> – 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.

<u>Sustainable Communities Strategy</u> – 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 <u>and represent the SCS for each of these subregions.</u>"*

<u>References to the RTP inducing growth</u> – 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.*

<u>CEQA Streamlining</u> – 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.*

<u>SCAG Authority</u> – 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.*

<u>SCAG's Ability to Accomplish Mitigation Measures</u> – 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~~ <u>shall, through cooperation, information sharing and</u> 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<u>, provide information and assistance to local agencies to help them avoid impacts to cultural resources</u>. 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

Attachment 1

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 NMeeks@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\

200 S. Anaheim Blvd., Suite 276
Anaheim, California 92805

TEL (714) 765-5176
FAX (714) 765-5225

www.anaheim.net

Attachment 1

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 (**bold** shows new word): "Anaheim **has** ~~will also have~~ 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 **Anaheim** Regional Transportation **Intermodal** Center **(ARTIC).** ~~in Anaheim.~~"
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 ~~strikeout,~~ additional words in **bold**): "Anaheim – The Anaheim Station ~~(ARTIC intermodal station)is planned as part of the 20-plus million square feet 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. C**urrently, 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 ARTIC ~~zone~~ **Mixed Use District** 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. ~~Overall, the Platinum Triangle has momentum and is expected to continue regardless of HSR access.~~ One major attribute that the Anaheim Station and HSR ridership will benefit from is the concentration of recreational **and convention** destinations within close proximity to the station, including Disneyland **Park, Disney's California Adventure and the Anaheim Convention Center in The Anaheim Resort** and ~~Angeles~~**the Angel** Stadium, Honda Center **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."**
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-AV6
- MM-AV12
- MM-BIO/OS20
- MM-BIO/OS29
- MM-BIO/OS30
- MM-BIO/OS31
- MM-BIO/OS32
- MM-BIO/OS33
- MM-BIO/OS34
- MM-BIO/OS35
- MM-BIO/OS50
- MM-BIO/OS51
- MM-CUL1
- MM-CUL2
- MM-CUL3
- MM-CUL4
- MM-CUL5
- MM-CUL6
- MM-CUL7
- MM-CUL8
- MM-CUL9
- MM-CUL10
- MM-CUL11
- MM-CUL12
- MM-CUL13
- MM-CUL15
- MM-CUL16
- MM-GEO1
- MM-GEO2
- MM-GEO3
- MM-GEO4
- MM-GEO6
- MM-HM3
- MM-HM4
- MM-HM5
- MM-HM6
- MM-HM7
- MM-HM9
- MM-HM10
- MM-HM11
- MM-HM12
- MM-HM13
- MM-HM14
- MM-HM15
- MM-HM16
- MM-LU10
- MM-LU11
- MM-LU17
- MM-LU14
- MM-LU19
- MM-LU20
- MM-LU28
- MM-LU30
- MM-LU38
- MM-LU43
- MM-LU44
- MM-LU48
- MM-LU58
- MM-NO1
- MM-NO4
- MM-NO8
- MM-NO9
- MM-NO18
- MM-POP2
- MM-POP4
- MM-PS1
- MM-PS2
- MM-PS4
- MM-PS8
- MM-PS10
- MM-PS12
- MM-PS13
- MM-PS14
- MM-PS16
- MM-PS35
- MM-PS36
- MM-PS37
- MM-PS42
- MM-PS43
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- MM-PS69
- MM-PS71
- MM-PS73
- MM-PS77
- MM-PS89
- MM-PS92
- MM-PS97
- MM-PS107
- MM-PS113
- MM-PS119
- MM-PS122
- MM-TR29
- MM-TR33
- MM-TR49
- MM-TR55
- MM-TR75
- MM-TR89
- MM-W6
- MM-W8
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- MM-W48
- MM-W49
- MM-W50
- MM-W51
- MM-W52
- MM-W54
- MM-W55
- MM-W56
- MM-W61
- MM-W62
- MM-W64
- MM-W66
- MM-W68

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, 12th Floor
Los Angeles, CA 90017-3435

SUBJECT: COMMENTS ON THE DRAFT 2012 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRAGETY (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 indentifies the future bus rapid transit connection planned near the Brea Mall that will connect Breans 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** *Mayor* **Brett Murdock** *Mayor Pro Tem* **Ron Garcia** *Council Member* **Roy Moore** *Council Member* **Marty Simonoff** *Council Member*

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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.

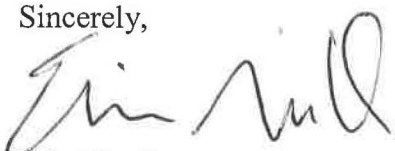
9. We request that the adoption of the final growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level consistent with past RTPs and that these numbers be reflected in the 2012 RTP/SCS. The use of smaller geographic levels, such as at the subregional, city, 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

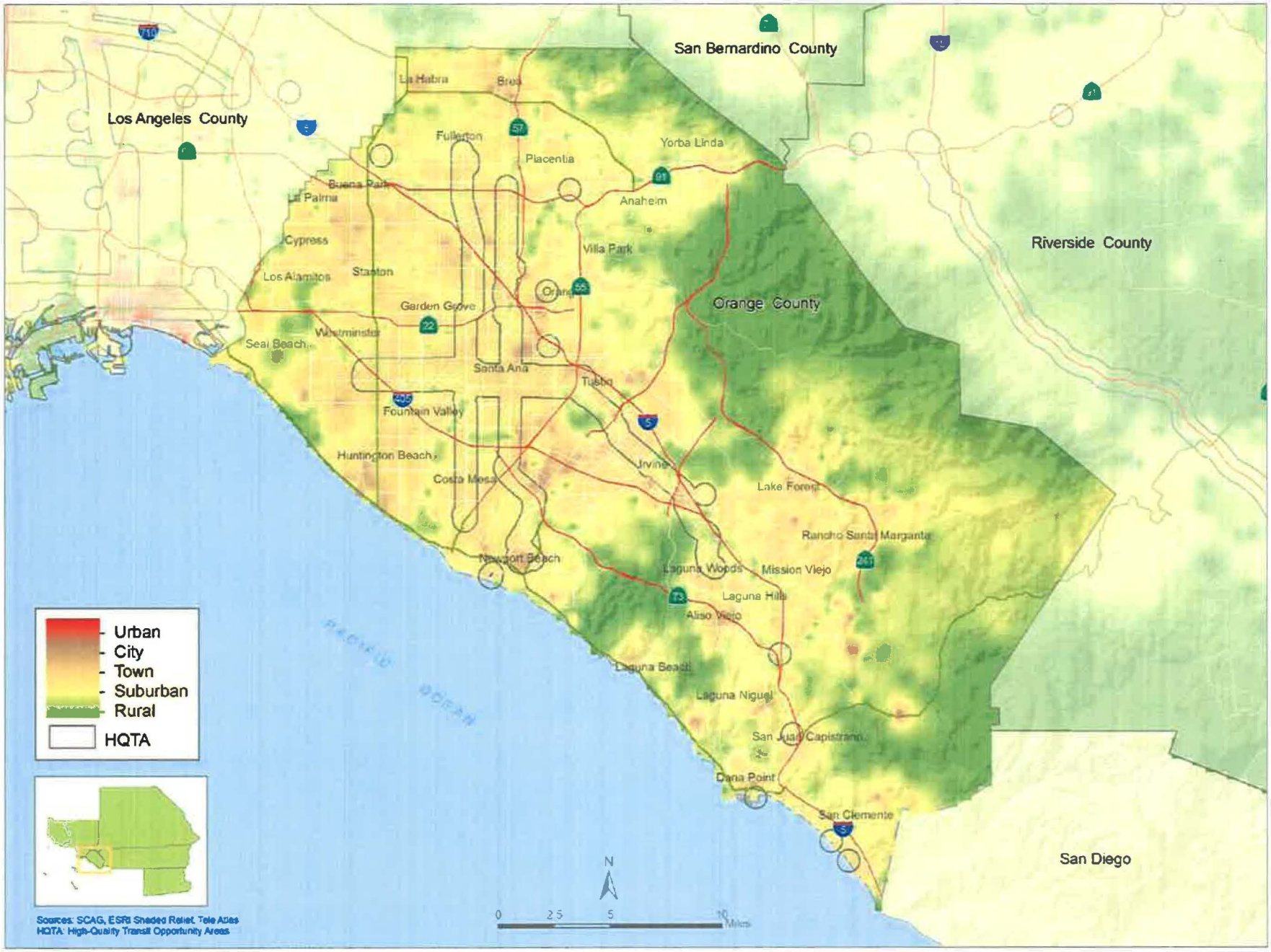
cc: Honorable Mayor and City Council
Brett Murdock, Member, SCAG Regional Council
Tim O'Donnell, City Manager
Charlie View, Public Works Director
David Crabtree, Deputy Director/City Planner
Adrienne Gladson, Senior Planner
Dave Simpson, Executive Director, Orange County Council of Governments (OCCOG)

Enclosures

EXHIBIT 4.17 Land Use Pattern Orange County (2035)

INCORRECT

EXHIBIT 34 Land Use Pattern Map - Orange County 2008



CORRECT

✓ Plan

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, 12th Floor
Los Angeles, California 90017-3435

via electronic mail to 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 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.

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

DENNIS R. YATES
Mayor

TOM HAUGHEY
Mayor Pro Tem

CITY of CHINO

GLENN DUNCAN
EARL C. ELROD
EUNICE M. ULLOA
Council Members

PATRICK J. GLOVER
City Manager

February 14, 2012

Mr. Jacob Lieb
Southern California Association of Governments (SCAG)
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

RE: Draft Program Environmental Impact Report (PEIR), SCH# 2011051018 for the 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy

Dear Mr. Lieb,

Thank you for the opportunity to review and comment on the Draft Program Environmental Impact Report (PEIR), SCH# 2011051018, for the 2012-2035 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS).

Consistent with concerns raised by SANBAG, the City of Chino requests clarification on the legal meaning of the phrase "local jurisdictions can and should...," which was used in many of the mitigation measures. It may be the case, as demonstrated in our land use comments below, that local jurisdictions "cannot" comply with some mitigation measures as they are currently written, because they lack the legal authority. Therefore, the word "can" should be removed from the mitigation measures.

Land Use

Mitigation Measure LU48, page 3.8-21, says "Local jurisdictions can and should increase densities in urban core areas to support public transit." While the City's General Plan identifies certain areas in the City where future growth would be appropriate, the authority to approve density increases rests with our voters. The voters of the City adopted an amendment to the General Plan known as "Measure M" on November 8, 1988, codified as Chapter 20.15 of the Chino Municipal Code, which prohibits the City Council from increasing the density of any land designated for a residential use within the City as of November 8, 1988. Mitigation Measure LU48 assumes that we as a local jurisdiction can increase densities, when in fact the City does not have that authority apart from voter authorization.

Transportation, Traffic & Security

The City of Chino is in support of the Goods Movement Truck Route proposal. However, the City has concerns with the freeway's proposed cross section and its affect on current and future projects.

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

The following is a list of five affected projects within the City of Chino contained in the "Project List" Supplemental Report:

1. RTP ID No. 4M07017-201133 SR 60 at Euclid Avenue - Widen W/B exit ramp from 2-3 lanes.

2. RTP ID No. 4M07008 SR-60 Ramona Avenue IC to SB I-15 Connector - Widen auxiliary lanes in each direction, widen connector from SB-15 to WB-60 and EB-60 to NB/SB-15, widen ramps from one lane to two lanes.

3. RTP ID No. 4M04050 SR 60 at Central Avenue - Add auxiliary lanes and widen ramps, construct entrance loop ramp.

4. RTP ID No. 4PL07019 SR 60 at Mountain Avenue - Reconstruct interchange SR-60 at Mountain Avenue.

5. RTP No. 4120202 SR-60 at Ramona Avenue - Reconstruct Interchange SR-60 at Ramona Avenue.

Close coordination between the State, County, City, and other affected jurisdictions should be required for any project proposal to ensure compatibility of design, including any interchange or regional arterial highway project along a proposed freeway route that is included in the SANBAG Development Mitigation Nexus Study. The Development Mitigation Nexus Study identifies fair-share contributions from new developments for regional transportation improvements in the San Bernardino Valley and Victor Valley. Please add a mitigation measure to the PEIR specifically requiring coordination with affected jurisdictions for projects falling within the SANBAG Development Mitigation Nexus Study area.

Water Resources

Mitigation Measure W39, page 3.13-42, should be revised to read as follows:

> Local water agencies can and should continue to evaluate future water demands and establish the necessary supply and infrastructure to meet that demand, as documented in their Urban Water Management Plans **and Facilities Master Plans.**

Thank you again for the opportunity to review and comment on the Draft PEIR for the RTP/SCS. Should you have any questions, please feel free to contact me at (909) 464-8310.

Sincerely,

Mike Kellison, AICP
Senior Planner

Cc: Jose Alire, Assistant City Manager
Brent Arnold, Interim Director of Community Development

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

CITY OF COLTON
INTEROFFICE MEMORANDUM

TO:	**MARK TOMICH, DIRECTOR OF DEVELOPMENT SERVICES**
FROM:	**AMER JAKHER, P.E., DIRECTOR OF PUBLIC WORKS AND UTILITY SERVICES DEPARTMENT** AJ
SUBJECT:	**RTP EIR REVIEW COMMENTS**
DATE:	**FEBRUARY 14, 2012**

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 he 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.

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year [Project Completion By]							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2016	2020	2023	2030	2035
San Bernardino	Local Highway	HIGHLAND	4120141				0	5th Street	City Creek Bridge	SR 210	Widen 5th St from City Creek to SR 210; Re-stripe 5th St from 4 to 6 Lanes btwn Church Ave and SR 210; Re-stripe 5th St from 4 to 5 Lanes with Additional Turn Lane at Freeway Undercrossing; Construct Truck Accelleration Lane on Southbound SR 210 On-Ramp and Freeway Mainline including Widening Existing Freeway Bridge									Exist Config: Deficient Lane Capacity					X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120153				0	6th St	Cucamonga Creek		Widen 6th St at Cucamonga Creek Channel (50% RC, 50% Ontario)									2 lanes in each direction								X	
San Bernardino	Local Highway	HESPERIA	4A01147				0	7th Ave	Ranchero Rd	Bear Valley Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction						X			
San Bernardino	Local Highway	HIGHLAND	4120143				0	9th St	Del Rosa Dr	Palm Ave	Striping Modification adding continuous center 2-way left turn lane and bike lanes									Exist Config: Deficient 2 lanes				X					
San Bernardino	Local Highway	HIGHLAND	4A07062				0	9th St	Del Rosa Dr	Victoria Av	Widen 9th St from Del Rosa Dr to Victoria Av from 2 to 4 lanes									Exist Config: 2 lanes					X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120154				0	9th St	Cucamonga Creek		Widen 9th St at Cucamonga Creek Channel									2 lanes in each direction								X	
San Bernardino	Local Highway	ADELANTO	4A04406				0	Adelanto Rd	Auburn Ave	Colusa Rd	New road, 2 lanes each dir									Exist Config:					X				
San Bernardino	Local Highway	ADELANTO	4120004				0	Adelanto Road	Air Expressway	El Mirage Rd	Widen Adelanto Road from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120002				0	Adelanto Road	Colusa	Oleander	Widen Adelanto Road from Colusa to Oleander									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120003				0	Adelanto Road	El Mirage Rd	Colusa Rd	Widen Adelanto Road from El Mirage to Colusa									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120001				0	Adelanto Road	Holly Rd	Air Expressway	Widen Adelanto Road from Holly to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	COLTON	4120130				0	Agua Mansa Rd	Rancho Av	Riverside Ave	Widen Agua Mansa Rd from Rancho Ave to Riverside Ave from 2 to 4 lanes									2 lanes in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120008				0	Air Expressway	Adelanto Rd	US-395	Widen Air Expressway from Adelanto Rd to US-395									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120006				0	Air Expressway	Aster	Richardson	Widen Air Expressway from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120005				0	Air Expressway	Richardson Rd	Lessing	Widen Air Expressway from Richardson to Lessing									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120007				0	Air Expressway	US-395	Aster	Widen Air Expressway from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A01188				0	Airport Dr	Rochester Av	Kettering Dr	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	ONTARIO	4120145				0	Airport Dr from Kettering Dr to Etiwanda Ave from 2 to 4 lanes	Kettering Dr	Etiwanda Ave	Widen Airport Dr from Kettering Dr to Etiwanda Ave from 2 to 4 lanes									2 lane in each direction								X	
San Bernardino	Local Highway	REDLANDS	4A01237				0	Alabama	3rd St	San Bernardino Av	Widen from 1 to 2 lanes each dir (note: RTIP#5BD31719 widens bridge at Santa Ana River)									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07017				0	Alabama	Lugonia Av	Barton Rd	Widen Alabama from Lugonia Ave to Barton Rd from 4 to 6 lanes									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	REDLANDS	4A07042				0	Alabama	N City Limits	Palmetto	Widen Alabama from N City Limits to Palmetto from 2 to 4 lanes									Widen to 2 lanes in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07175				0	Alabama St	3rd St	City Limits	Widen Alabama St from 3rd St to City Limits from 2 to 4 lanes									2 in each direction							X		
San Bernardino	Local Highway	REDLANDS	4A07073				0	Alabama St	Lugonia	Palmetto	Widen Alabama St from Lugonia Ave to Palmetto Ave from 4 to 6 lanes									Exist Config: 4 lanes each direction						X			
San Bernardino	Local Highway	FONTANA	4A07349				0	Alder Av	Taylor St	Valley Blvd	Widen Alder Ave from Taylor St to Valley Blvd from 2 lanes to 4									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07253				0	Alder Av	Valley	San Bernardino	Widen Alder Ave from Valley Blvd to San Bernardino Av from 2 lanes to 4									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	RIALTO	4120181				0	Alder Ave	Baseline Rd	SR-30	Widen Alder Ave from Baseline Rd to SR-30 from 2 to 6 lanes									2 in each direction						X			
San Bernardino	Local Highway	FONTANA	4A07126				0	Alder Ave	Jurupa	N/ Slover	Widen Alder Ave from Jurupa to n/o Slover Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07322				0	Alder Ave	Jurupa Ave	N .12M	Widen Alder Ave from Jurupa Ave to .12M north from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07262				0	Alder Ave	Slover	N 0023M	Widen Alder Ave from Slover Ave to .23M north from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07319				0	Amargosa Rd	1780' n/o Village Drive	At Power Line Easement	Widen Amargosa Rd from 1780' n/o Village Dr to center of LADWP Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07318				0	Amargosa Rd	2050' s/o Air Base Rd	At Power Line Easement	Widen Amargosa Rd from 2050' s/o Air Base Dr to Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07276				0	Amargosa Rd	Clovis Rd	Rancho Rd	Widen Amargosa Rd from Clovis Rd to Rancho Road from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07281				0	Amargosa Rd	Just s/o Air Base Rd	At Power Line Easement	Widen Amargosa Rd from Just s/o Air Base Rd to Power Line Easement from 1 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07149				0	Amargosa Rd	Rancho Rd	Village Dr	Widen Amargosa Rd from Rancho Rd to Village Dr from 0 to 4 lanes (includes wash crossing)									Exist Config: New road				X					
San Bernardino	Local Highway	ADELANTO	4120010				0	Amethst	Desert Flower	Oleander	Widen Amethst from Desert Flower to Oleander									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	ADELANTO	4120009				0	Amethst	Holly Rd	Rancho	Widen Amethst from Holly to Rancho									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	VICTORVILLE	4A07210				0	Amethyst	Palmdale Rd	Seneca Rd	Widen Amethyst Rd from Palmdale Rd to Seneca Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07296				0	Amethyst Rd	Just n/o Hopland	Power Line Easement	Widen Amethyst Rd from Just n/o Hopland to Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07223				0	Amethyst Rd	Rancho Rd	Hopland	Widen Amethyst Rd from Rancho Rd to Hopland from 0 to 4 lanes									Exist Config: New road				X					
San Bernardino	Local Highway	APPLE VALLEY	4A01008				0	Apple Valley Rd	SR-18	Yucca Loma Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction					X				
San Bernardino	Local Highway	APPLE VALLEY	4120095				0	Apple Valley Rd	Ohna	Falchion	Widen Apple Valley Rd from Ohna to Falchion from 0 to 2 lanes									1 lane in each direction						X			
San Bernardino	Local Highway	ONTARIO	4G0116				0	Archibald Av	in Ontario	(Los Angeles)	Roadway Widening (Low Option), Grade Separation (High Option) - Widen 2-6 lanes									2 lanes in ea direction						X			
San Bernardino	Local Highway	ONTARIO	4A04189				0	Archibald Ave from Edison Ave to South City Limits from 2 to 6 lanes	Edison Ave	South City Limits	Widen Archibald Ave from Edison Ave to South City Limits from 2 to 6 lanes									3 lane in each direction							X		
San Bernardino	Local Highway	ONTARIO	4A04190				0	Archibald Ave from Riverside Ave to Edison Ave from 2 to 6 lanes	Riverside Ave	Edison Ave	Widen Archibald Ave from Riverside Ave to Edison Ave from 2 to 6 lanes									3 lane in each direction							X		
San Bernardino	Local Highway	FONTANA	4A07066				0	Arrow Blvd	Alder Ave	Maple Ave	Widen from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4120125				0	Arrow Highway	Almeria	Citrus	Widen Arrow Highway from Almeria Ave to Citrus Ave from 2 to 4 lanes									2 lanes in each direction						X			

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	UPLAND	4A07179				0	Arrow Route	Clairmont	Central Ave	Widen Arrow Route from Clairmont Ave to Central Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	UPLAND	4A07076				0	Arrow Route	County Line	Central Ave	Widen Arrow Route from County Line to Central Ave from 2 to 4 lanes									Exist Config: 2 lane roadway								X	
San Bernardino	Local Highway	FONTANA	4A07024				0	Arrow Route	Hickory Ave	Tokay Ave	Widen Arrow Route from Hickory Av to Tokay Av from 2 to 4 lanes									2 lanes in each direction						X			
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120157				0	Arrow Route	Etiwanda Ditch		Widen Arrow Route at Etiwanda Ditch									1 to 2 lanes 2 in each direction				X					
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120163				0	Arrow Route	Grove St to Ba	Baker St	Widen Arrow Route from Grove St to Baker St from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120161				0	Arrow Route	south side 500 ft east of I-15	1300 ft east	Widen Arrow Route from south side 500 ft east of I-15 to 1300 ft east from 2 to 4 lanes									2 in each direction					X				
San Bernardino	Local Highway	ADELANTO	4120011				0	Aster	Air Expressway	El Mirage Rd	Widen Aster from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120014				0	Aster	Colusa	Oleander	Widen Aster from Colusa to Oleander									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120013				0	Aster	El Mirage Rd	Colusa Rd	Widen Aster from El Mirage to Colusa									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120012				0	Aster	Palmdale Rd	Air Expressway	Widen Aster from Palmdale to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	VICTORVILLE	4A07348				0	Aster Rd	Olivine Rd	Del Rosa Rd	Widen Aster Rd from Olvine Rd to Del Rosa Rd from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07221				0	Aster Rd	Palmdale Rd	Olvine Rd	Widen Aster Rd from Palmdale Rd to Olvine Rd from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	ADELANTO	4A04405				0	Aster Rd	Rancho Rd	Air Expressway	New road, 1 lane each dir									Exist Config:			X						
San Bernardino	Local Highway	VICTORVILLE	4A07170				0	ASTER ROAD	MOJAVE DR	CACTUS ROAD	Widen from 1 to 2 lanes each dir									Exist Config: Dirt Road						X			
San Bernardino	Local Highway	ADELANTO	4A04400				0	Auburn/Adelanto	Chamberlain Way (Crippen Rd)	Jonathan St	Widen from 2 to 4 lanes each dir									Exist Config:						X			
San Bernardino	Local Highway	YUCAIPA	4A07248				0	Ave E	14th St	Bryant St	Widen Ave E from 14th St to Bryant St from 2 lanes to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	YUCAIPA	4A04416				0	Avenue E	8th St	Bryant St	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200810	200810	0		0	BAKER			BAKER BLVD. BRIDGE - OVER MOJAVE RIVER, 0.2 MI SW OF DEATH VALLEY RD REPLACE 2 LANE BRIDGE W 4 LANE BRIDGE (BRIDGE NO 54C0127)	BAKER BLVD	n/a	150' E/O MOJAVE FLOOD CHANNEL	BRIDGE SPAN	BRIDGE REPLACEMENT	2	4							X				
San Bernardino	Local Highway	VICTORVILLE	4A07285				0	Baldy Mesa Rd	La Mesa Rd	Olivine Rd	Widen Baldy Mesa Rd from La Mesa Rd to Olivine Rd from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A01310				0	Baldy Mesa Rd	Palmdale Rd	La Mesa Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07145				0	Banana Ave	Jurupa	N/Slover	Widen Banana Ave from Jurupa Ave to N/Slover Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120159				0	Banyan St	Etiwanda	East Ave	Widen Banyan St from Etiwanda to East Ave, north side only 1-2 lanes									2 total lanes on north side				X					
San Bernardino	Local Highway	ADELANTO	4120018				0	Bartlett	Adelanto Rd	US-395	Widen Bartlett from Adelanto to US-395									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120016				0	Bartlett	Aster	Richardson	Widen Bartlett from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120017				0	Bartlett	Richardson Rd	Cauglin	Widen Bartlett from Richardson to Cauglin									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120015				0	Bartlett	US-395	Aster	Widen Bartlett from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	GRAND TERRACE	4A01139				0	Barton Rd	Honey Hills	N.E. City Limits	Widen from 1 to 2 lanes each dir									Exist Config: one lane in each direction					X				
San Bernardino	Local Highway	GRAND TERRACE	4A01141				0	Barton Rd	I-215	West City Limits	Widen from 1 to 2 lanes each dir									Exist Config: one lane in each direction						X			
San Bernardino	Local Highway	LOMA LINDA	4A07245				0	Barton Rd	Loma Linda City Limits	California St	Widen Barton Rd from Loma Linda City Limits to California St from 4 to 6 lanes									Exist Config: 2 lanes each direction						X			
San Bernardino	Local Highway	[redacted]	4A01066				0	Barton Rd	S. City Limits	Waterman Av	Widen from 2 to 3 lanes each dir (note: overlaps RTIP#200054 and SBD78022, Reche Cyn to Waterman)									Exist Config: 4 Lane Major Arterial Street			X						
San Bernardino	Local Highway	GRAND TERRACE	4120139				0	Barton Rd	West side of I-215 Overcrossing	East side of I-215 Overcrossing	Widen Barton Rd at I-215 Overcrossing from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	RIALTO	4A07121				0	Baseline	West City Limits	Ayala/Cedar	Widen and reconstruct Baseline from West City Limits to Ayala Dr from 2 to 4 lanes									Exist Config:									X
San Bernardino	Local Highway	FONTANA	4A07083				0	Baseline Av	Mango	Maple	Baseline Ave from Mango Ave to Maple Ave Widen from 2 to 6 lanes									Exist Config: 1 lane each direction			X						
San Bernardino	Local Highway	FONTANA	4A07212				0	Baseline Ave	Citrus	Sierra	Widen Baseline Ave from Citrus Ave to Sierra Ave from 2 to 6 lanes									3 lane in each direction						X			
San Bernardino	Local Highway	RIALTO	4120182				0	Baseline Rd	West to East City Limits	East City Limits	Widen and reconstruct Baseline Rd from West to East City Limits from 4 to 6 lanes									3 in each direction						X			
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120155				0	Baseline Rd	Etiwanda Ave	I-15	Widen Baseline Rd from Etiwanda Av to I-15 from 3 lanes to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07074				0	Bear Valley Cutoff	Joshua Rd	SR-18	Widen Bear Valley Cuoff from Joshua Rd to SR-18 from 2 to 6 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07391				0	Bear Valley Rd	1270' w/o Topaz Rd	At Power Line Easement	Widen Bear Valley Rd from 1270' w/o Topaz Rd to Power Line Easement from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07355				0	Bear Valley Rd	1920' e/o Topaz Rd	At Power Line Easement	Widen Bear Valley Rd from 1920' e/o Topaz Rd to Power Line Easement									Exist Config:						X			
San Bernardino	Local Highway	APPLE VALLEY	4AD1011				0	Bear Valley Rd	Apple Valley Rd	Navajo Rd	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction							X		
San Bernardino	Local Highway	VICTORVILLE	4A07156				0	Bear Valley Rd	US Hwy 395	Aster Rd (Monte Vista Rd)	Widen Bear Valley from US Hwy 395 to Aster Rd from 2 lanes to 6 lanes.									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	APPLE VALLEY	4120096				0	Bear Valley Rd	Kiowa	Navajo Rd	Widen Bear Valley Rd from Kiowa Rd to Navajo Rd from 4 to 6 lanes									3 lane in each direction								X	
San Bernardino	Local Highway	APPLE VALLEY	4A07080				0	Bear Valley Rd	Navajo Rd	Joshua Rd	Widen Bear Valley Rd from Navajo Rd to Joshua Rd from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120022				0	Beaver	Air Expressway	El Mirage Rd	Widen Beaver from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120019				0	Beaver	Colusa	Oleander	Widen Beaver from Colusa to Oleander									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120020				0	Beaver	El Mirage Rd	Colusa Rd	Widen Beaver from El Mirage to Colusa									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120023				0	Beaver	Palmdale Rd	Air Expressway	Widen Beaver from Palmdale to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120021				0	Beaver	Villa	Victor	Widen Beaver from Villa to Victor									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	FONTANA	4A07185				0	Beech	Arrow Route	SH-66	Widen Beech Ave from Arrow Route to SH-66 from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07104				0	Beech	Randall Av	Arrow Route	Widen Beech Ave from Randall Ave to Arrow Route from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07157				0	Beech	Valley	Randall	Widen Beech Ave from Valley to Randall Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4120124				0	Beech Ave	Miller	Foothill	Widen Beech Ave from Miller Ave to Foothill Blvd from 2 to 4 lanes									2 lanes in each direction						X			

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)						
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	FONTANA	4A07040				0	Cherry	Valley	Foothill	Widen Cherry Av from Valley to Foothill Blvd from 4 to 6 lanes									Exist Config: 2 lanes each direction						X			
San Bernardino	Local Highway	FONTANA	4A01089				0	Cherry Av	Jurupa Av	Slover Av	Widen from 1 to 3 lanes each dir									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	FONTANA	4A04091				0	Cherry Av	Valley Bl	San Bernardino Av	Widen from 2 to 3 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4120126				0	Cherry Ave Bridge	Merrill Ave	Whittram Ave	Widen Cherry Ave Bridge from Merrill Ave to Whittram from 4 to 6 lanes									3 lane in each direction						X			
San Bernardino	Local Highway	ONTARIO	4A04194				0	Chino Av	Euclid Av	Milliken Bl	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	CHINO	4120105				0	Chino Ave	600' e/o Monte Vista Rd	Sixth St	Widen Chino Ave from 600' e/o Monte Vista Rd to Sixth St from 2 to 4 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	CHINO	4A01029				0	Chino Ave	Central Ave	600' East of Monte Vista	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	CHINO	4A01028				0	Chino Ave	Central Ave	Mountain Ave	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A01030				0	Chino Ave	Fern Av	Euclid Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	CHINO	4A07205				0	Chino Ave	Mountain	Fern	Widen Chino from Mountain to Fern from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	CHINO	4A01031				0	Chino Ave	SR-71	East End Ave	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction									X
San Bernardino	Local Highway	CHINO	4A01062				0	Chino Hills Pkwy	Ramona	Chino Creek Bridge	Widen Chino Hills Pkwy from Ramona Ave to Chino Creek Bridge from 4 to 6 lanes									3 lane in each direction						X			
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120165				0	Church Ave	Archibald	Haven	Widen Church Ave from Archibald to Haven from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	REDLANDS	4A01239				0	Church St	Colton Av	Redlands Bl	Widen from 1 to 2 lanes each dir (note: RTIP#SBD59012 widens from Colton to Clark)									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	FONTANA	4A04095				0	Citrus Av	San Bernardino Av	Foothill Blvd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4A01094				0	Citrus Av	San Bernardino Av	Valley Bl	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4A01096				0	Citrus Av	Slover Av	Jurupa Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4120127				0	Citrus Ave	Baseline Ave	So. Highland Ave	Widen Citrus Ave from Baseline Ave to So. Highland Ave from 2 to 4 lanes									1 lane in each direction						X			
San Bernardino	Local Highway	REDLANDS	4A04240				0	Citrus Ave	Dearborn St	Wabash Ave	Widen Citrus Ave from Dearborn St to Wabash Ave from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	VICTORVILLE	4A07331				0	Civic Dr	Mojave Dr	Roy Rodgers Dr	Widen Civic Dr from Mojave Dr. to Roy Rogers Dr. from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	ADELANTO	4120036				0	Colbalt Road	Holly Rd	Rancho	Widen Colbalt Road from Holly to Rancho									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	REDLANDS	4120173				0	Colton Av	Wabash Av	Crafton Av	Widen Colton Av from Wabash Av to Crafton Av from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	COLTON	4120111				0	Colton Ave	Mt. Vernon Ave.	City Limits	Widen Colton Av from Mt. vernon Ave.Av to City Limit from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	ADELANTO	4120038				0	Colusa	Aster	Richardson	Widen Colusa from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	ADELANTO	4120039				0	Colusa	Mesa	Adelanto Rd	Widen Colusa from Mesa to Adelanto									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	ADELANTO	4120037				0	Colusa	Richardson Rd	Caughlin Rd	Widen Colusa from Richardson to Caughlin									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	GRAND TERRACE	4A07085				0	Commerce Way	900 ft. North of De Berry	Pico	Widen Commerce Wy from 900' n/o DeBerry Rd to Pico Av from 2 to 4 lanes									Exist Config: Does not exist				X					
San Bernardino	Local Highway	GRAND TERRACE	4A07027				0	Commerce Wy	900' n/o Pico	Main St	Extend Commerce Wy from 900' n/o Pico to Main St from 0 to 4 lanes									2lanes in each direction						X			
San Bernardino	Local Highway	HIGHLAND	4A07150				0	Cone Camp Rd	Greenspot Rd	South City Limit	Construct new street from 0 to 2 lanes									Exist Config: 0 lanes								X	
San Bernardino	Local Highway	ONTARIO	4A07326				0	Construct a Bridge on Archibald Ave over Lower Deer Creek			Construct a Bridge on Archibald Ave over Lower Deer Creek-Widen 2-6 lanes									2 lanes in ea direction								X	
San Bernardino	Local Highway	ONTARIO	4A07277				0	Construct a Bridge on Archibald Ave over Upper Deer Creek			Construct a Bridge on Archibald Ave over Upper Deer Creek-Widen 4-6 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A07278				0	Construct a Bridge on Archibald Ave over Upper Deer Creek Spillway			Construct a Bridge on Archibald Ave over Upper Deer Creek Spillway-Widen4-6 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A07174				0	Construct a Bridge on Eight St over Cucamonga Creek			Construct a Bridge on Eight St over Cucamonga Creek-Widen 2-4 lanes									1 lane in each direction									X
San Bernardino	Local Highway	ONTARIO	4A07208				0	Construct a Bridge on Francis St over Cucamonga Creek			Construct a Bridge on Francis St over Cucamonga Creek-sidewalk only																	X	
San Bernardino	Local Highway	ONTARIO	4A07325				0	Construct a Bridge on Hold Blvd over West Cucamonga Creek			Construct a Bridge on Hold Blvd over West Cucamonga Creek--Widen 4-6 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A07327				0	Construct a Bridge on Holt Blvd over Cucamonga Creek			Construct a Bridge on Holt Blvd over Cucamonga Creek-Widen-4-6 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A07317				0	Construct a Bridge on Mission Blvd over Cucamonga Creek			Construct a Bridge on Mission Blvd over Cucamonga Creek-Widen 4-6 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A07215				0	Construct a Bridge on Mission Blvd over West Cucamonga Creek			Construct a Bridge on Mission Blvd over West Cucamonga Creek-Widen 4-6 lanes									1 lane in each direction								X	

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)						
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	ONTARIO	4A07267				0	Construct a Bridge on Riverside Dr over Cucamonga Creek			Construct a Bridge on Riverside Dr over Cucamonga Creek-Widen 4-6 lanes									1 lane in each direction									X
San Bernardino	Local Highway	ONTARIO	4A07260				0	Construct a Bridge on Sixth St over Cucamonga Creek			Construct a Bridge on Sixth St over Cucamonga Creek-Sidewalk only															X			
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120172				0	Construct new bridge at Wilson and Day Creek Channel			Construct new bridge at Wilson and Day Creek Channel									Construct new 4 lane bridge								X	
San Bernardino	Local Highway	APPLE VALLEY	4A01013				0	Corwin Rd	SR-18	Dale Evans Pkwy	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction			X						
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07081				0	Couiston	Tippecanoe	Mt. View	Widen Coulston Av from Tippecanoe to Mt. View from 2 to 4 lanes									Exist Config: 1 lane each direction								X	
San Bernardino	Local Highway	YUCAIPA	4A01370				0	County Line Rd	Calimesa Blvd	Bryant St	Widen County Line Rd from Calimesa Blvd to Bryant St from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	FONTANA	4A07114				0	Coyote Cnyn	Saddleback	I-15	Coyote Canyon Rd from Saddleback Rd to I-15 Widen from 0 to 4 lanes									Exist Config: Does not exist					X				
San Bernardino	Local Highway	REDLANDS	4120237				0	Crafton Hills Parkway	Wabash	Tennessee	Widen Crafton Hills Parkway from Wabash to Tennessee from 0 to 2 lanes									1 in each direction								X	
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07028				0	CRAFTON HILLS PARKWAY	WABASH AVE	OVERCREST/TENNESSEE	Pave dirt road, 1 lane each dir									Exist Config: Dirt Road						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07238				0	Crafton Hills Pkwy	Wabash Ave	E/Crafton PUD	Widen Crafton Hills Pkwy from Wabash Ave to E/Crafton PUD from 0 to 2 lanes									Exist Config:									X
San Bernardino	Local Highway	FONTANA	4120128				0	Cypress Ave	Duncan Canyon Rd	Frontage Rd (I-15)	Widen Cypress Ave from Duncan Canyon Rd to Frontage Rd (I-15) from 2 to 4 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	FONTANA	4A04098				0	Cypress Ave	So. Highland Ave	Sierra Lakes Pkwy	Widen Cypress Ave from So. Highland Ave to Sierra Lakes Pkwy from 0 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	REDLANDS	4A01241				0	Cypress Ave	I-10	Citrus Av	Widen Cypress Ave from I-10 to Citrus Av from 2 lanes to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	APPLE VALLEY	4A07007				0	Dale Evans Pkwy	Thunderbird Rd	I-15	Widen Dale Evans Pkwy from Thunderbird Rd to I-15 from 2 lanes to 4 lanes.									Exist Config: 1 lane in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07130				0	Daley Canyon at SH 18	in San Bernardino County		Intersection Improvements									At SH-18. Exist Config: T intersection to SH 18						X			
San Bernardino	Local Highway	APPLE VALLEY	4A07063				0	Deep Creek Rd	Bear Valley Rd	Sitting Bull Rd	Widen Deep Creek Rd from Bear Valley Rd to Sitting Bull Rd from 0 to 4 lanes									Exist Config: does not currently exist							X		
San Bernardino	Local Highway	APPLE VALLEY	4A07069				0	Deep Creek Rd	Tussing Ranch Rd	Bear Valley Rd	Widen Deep Creek Rd from Tussing Rach Rd to Bear Valley Rd from 2 to 4 lanes									Exist Config: 1 lane in each direction					X				
San Bernardino	Local Highway	APPLE VALLEY	4A07010				0	Del Oro Rd	Apple Valley Rd	Central Rd	Widen Del Oro Rd from Appley Valley Rd to Central Rd from 0 lanes to 2 lanes									Exist Config: 2 lanes in parts, mostly not build yet					X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07232				0	Del Rosa Ave	6th St	9th St	Widen Del Rosa Ave from 6th St to 9th St from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07380				0	Del Rosa Ave	Del Rosa Dr	San Bernardino City Limits	Widen Del Rosa Ave from Del Rosa Dr to San Bernardino City Limits from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	ADELANTO	4120041				0	Desert Flower	Aster	Caughlin Rd	Widen Desert Flower from Aster to Caughlin									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120040				0	Desert Flower	City Limits	Adelanto Rd	Widen Desert Flower from City Limits to Adelanto									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120045				0	Desoto	Aguadera	US-395	Widen Desote from Aguadera to US-395									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120044				0	Desoto	Aster	Richardson	Widen Desoto from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120043				0	Desoto	Richardson Rd	Vinton	Widen Desoto from Richardson to Vinton									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120042				0	Desoto	US-395	Aster	Widen Desoto from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	SANBAG	4A07270				0	Devore Rd	Cajon Blvd	n/o I-215 off ramps	Widen Devore Rd from Cajon Blvd to n/o I-215 off ramps from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07125				0	Devore Rd	I-215	Kenwood Dr	Widen Devore Rd from I-215 to Kenwood Dr from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07300				0	Devore Rd	Kenwood Dr	Foothill Dr.	Widen Devore Rd from Kenwood Dr to Foothill Dr from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07088				0	Dos Palmas	Pacoima Rd	Borego Rd	Widen Dos Palmas Rd from Pacoima Rd to Borego Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07220				0	Dos Palmas	San Mateo Rd	Pacoima	Widen Dos Palmas Rd from San Mateo Rd to Pacoima Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07297				0	Duncan Canyon Rd	.33 m w/o I-15	e/o I-15	Widen Duncan Canyon Rd from .33 m w/o I-15 to e/o I-15									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4120129				0	Duncan Canyon Rd	Citrus	Sierra	Widen Duncan Canyon Rd from Citrus Ave to Sierra Ave from 0 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	FONTANA	4120130				0	Duncan Canyon Rd	I-15	Citrus	Widen Duncan Canyon Rd from I-15 to Citrus Ave from 0 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	HESPERIA	4A07037				0	E Avenue	Main St	I Avenue	Widen E Avenue from Main St to I St from 2 to 4 lanes									Exist Config: 1 lane in each direction							X		
San Bernardino	Local Highway	COLTON	4G0156				0	E St	in Colton	BNSF Crossing	Safety Upgrade (Low Option), Safety Upgrade (High Option)									At grade-removing grade crossing will be culdesac				X					
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120162				0	East Ave	Fire Station	Wilson Ave	Widen East Ave from Fire Station to Wilson Ave									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	CHINO	4A07133				0	East End Ave	Chino Ave	Walnut Ave	Widen East End Ave from Chino Ave to Walnut Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07146				0	East End Ave	Philadelphia Av	Phillips Blvd	Widen East End Av from Philadelphia Av to Phillips Blvd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	MONTCLAIR	4A07333				0	East End Ave from Phillips Blvd to Grand Ave from 2 to 4 lanes	Phillips Blvd	Grand Ave	Widen East End Ave from Phillips Blvd to Grand Ave from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120156				0	East St	I-15	VICTORIA AVE.	Widen East St from I-15 to Victoria Ave from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120148				0	East St	Wison	North Rim Way (new)	Widen East St from Wison to North Rim Way (new)									2 lanes in each direction								X	
San Bernardino	Local Highway	CHINO	4A01032				0	Edison Av	Central Av	Euclid Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	CHINO	4A01033				0	Edison Ave	Pipeline	Ramona	Widen Edison Ave from Pipeline Ave to Ramona Ave from 4 to 6 lanes									3 lane in each direction						X			
San Bernardino	Local Highway	ONTARIO	4A04197				0	Edison Ave from Euclid Ave to Walker Ave from 2 to 6 lanes	Euclid Ave	Walker Ave	Widen Edison Ave from Euclid Ave to Walker Ave from 2 to 6 lanes									3 lane in each direction								X	

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	ONTARIO	4A04196				0	Edison Ave from Mill Creek to Milliken Ave from 2 to 8 lanes	Mill Creek	Milliken Ave	Widen Edison Ave from Mill Creek to Milliken Ave from 2 to 8 lanes									4 lanes in each direction total									X	
San Bernardino	Local Highway	ONTARIO	4A04198				0	Edison Ave from Vineyard Ave to Mill Creek from 2 to 8 lanes	Vineyard Ave	Mill Creek	Widen Edison Ave from Vineyard Ave to Mill Creek from 2 to 8 lanes									4 lanes in each direction total									X	
San Bernardino	Local Highway	ONTARIO	4A04199				0	Edison Ave from Walker Ave to Vineyard Ave from 2 to 8 lanes	Walker Ave	Vineyard Ave	Widen Edison Ave from Walker Ave to Vineyard Ave from 2 to 8 lanes									4 lanes in each direction total									X	
San Bernardino	Local Highway	VICTORVILLE	4A07099				0	El Evado	La Brisa Rd	Anacapa Rd	Widen El Evado Rd from Las Brisa Rd to Anacapa Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07307				0	El Evado Rd	1260' n/o Hook Bl	At Power Line Easement	Widen El Evado Rd from 1260' n/o Hook Bl to Power Line Easement									Exist Config:						X			
San Bernardino	Local Highway	VICTORVILLE	4A07330				0	El Evado Rd	510' s/o Rancho Rd	At Power Line Easement	Widen El Evado Rd from 510' s/o Rancho Rd to At Power Line Easement from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	APPLE VALLEY	4A01270				0	El Mirage Rd	Koala Rd	LA County Line	Widen from 1 to 2 lanes each dir (note: #4A01004 in Adelanto widens from Richardson to US-395 to 4 lanes each dir in 2015)									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	ADELANTO	4A01004				0	El Mirage Rd	Richardson Rd	US-395	Widen from 2 to 4 lanes each dir									Exist Config:					X				
San Bernardino	Local Highway	ADELANTO	4A04408				0	El Mirage Rd	US-395	Adelanto Rd	New road, 2 lanes each dir												X						
San Bernardino	Local Highway	ADELANTO	4120047				0	El Mirage Road	Aguadera	US-395	Widen El Mirage Road from Aguadera to US-395									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120046				0	El Mirage Road	US-395	Aster	Widen El Mirage Road from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	CHINO	4A01063				0	El Prado Rd	Central Av	Pine Ave	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	RIALTO	4A07087				0	El Rivino Rd	Cedar Av	Agua Mansa Rd	Widen El Rivino Rd from Cedar Av to Agua Mansa Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07094				0	Electric Ave	Mt. View	Northpark Blvd	Widen Electric Ave from Mt View Ave to Northpark Blvd from 2 to 4 lanes									Exist Config: 1 lane each direction								X	
San Bernardino	Local Highway	ADELANTO	4120048				0	Emerald	Holly Rd	Air Expressway	Widen Emerald from Holly to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	VICTORVILLE	4A07309				0	Emerald Rd	Palmdale RD	Seneca Rd	Widen Emerald Rd from Palmdale Rd to Seneca Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	HESPERIA	4A01149				0	Escondido Av	Main St	Sultana St	Widen from 1 to 3 lanes each dir									Exist Config: 1 lane in each direction					X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120152				0	Etiwanda Ave	Miller	850' n/o Miller	Widen Etiwanda Ave from Miller to 850' n/o Miller, east side only									2 lanes in each direction								X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120169				0	Etiwanda Ave	6th	Arrow Route	Widen Etiwanda Ave from 6th to Arrow Route from 2 to 4 lanes									2 in each direction					X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120164				0	Etiwanda Ave	Banyan	Wilson Ave	Widen Etiwanda Ave from Banyan to Wilson									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120149				0	Etiwanda Ave	existing terminus	North Rim Way (new)	Widen Etiwanda Ave from existing terminus to North Rim Wy (new)									2 lanes in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A04200				0	Eucalyptus Ave from Euclid Ave to Walker from 2 to 4 lanes	Euclid Ave	Walker	Widen Eucalyptus Ave from Euclid Ave to Walker from 2 to 4 lanes									2 lane in each direction										X
San Bernardino	Local Highway	VICTORVILLE	4A07249				0	Eucalyptus St	Amargosa Rd	Amethyst Rd	Widen Eucalyptus St from Amargosa Rd to Amethyst Rd from 0 to 6 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	HESPERIA	4A01151				0	Eucalyptus St	I-15	Peach Av	Widen from 1 to 2 lanes each dir									Exist Config: Roadway exists in certain locations								X	
San Bernardino	Local Highway	VICTORVILLE	4A07286				0	Eucalyptus St	Mesa View Dr	Bellflower Rd	Widen Eucalyptus St from Mesa View Dr. to Bellflower Rd from 0 to 4 lanes (Victorville portion only)									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07287				0	Eucalyptus St	US-395	Mesa View Dr.	Widen Eucalyptus St from US 395 to Mesa View Dr. from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4120224				0	Eucalyptus St	Amethyst	0.15 mi w/o Cobalt Rd	Widen Eucalyptus St from Amethyst Rd to 0.15 mi w/o Cobalt Rd from 0 to 4 lanes (includes wash crossing)									2 in each direction						X			
San Bernardino	Local Highway	CHINO	4120106				0	Euclid Ave (SR-83)	Merrill Ave	Kimball Av	Widen Euclid Ave (SR-83) from Merrill Ave to Kimball Ave from 2 to 4 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	CHINO	4A04035				0	Euclid Av	Kimball	Pine	Widen from 2 to 4 lanes each dir									Exist Config: 2 lanes each direction						X			
San Bernardino	Local Highway	CHINO	4A04036				0	Euclid Av	Pine	SR71	Widen from 1 to 4 lanes each dir									Exist Config: 1 lane each direction									X
San Bernardino	Local Highway	ONTARIO	4A04201				0	Euclid Ave from Riverside Dr to Merrill Ave (east half) from 2 to 4 lanes	Riverside Dr	Merrill Ave	Widen Euclid Ave from Riverside Dr to Merrill Ave (east half) from 2 to 4 lanes									2 lane in each direction										X
San Bernardino	Local Highway	LOMA LINDA	4120144				0	Evans St.	I-10	Barton Rd.	Widen Evans St from I-10 to Barton Rd from 0 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A04067				0	Fairway Dr	Sperry Dr	City Limits	Widen from 2 to 4 lanes each dir									Exist Config: 2 Lane Secondary Arterial Street					X				
San Bernardino	Local Highway	APPLE VALLEY	4A07161				0	Falchion Rd	Dale Evans	Navajo	Widen Falchion Rd from Dale Evans Pkwy to Navajo Rd from 0 to 6 lanes									Exist Config: not built yet					X				
San Bernardino	Local Highway	APPLE VALLEY	4A07006				0	Falchion Rd	I-15	Dale Evans Pkwy	Widen Falchion Rd from I-15 to Dale Evans Pkwy from 0 to 4 lanes									Exist Config: not built yet					X				
San Bernardino	Local Highway	REDLANDS	4A01262A				0	Fifth Av	Wabash Av	Crafton Av	Widen Fifth Av from Wabash Av to Crafton Av from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07230				0	Fifth St	Pedley Rd	Tippecanoe Av	Widen Fifth St from Pedley Rd to Tippecanoe Av from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07234				0	Fifth St	Waterman Ave	Pedley Rd	Widen Fifth St from Waterman Ave to Pedley Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07162				0	Florida St	Greenspot Rd	Garnet St	Widen Florida St from Greenspot Rd to Garnet St from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	FONTANA	4A04101				0	Fontana Av	Valley Bl Poplar	Merrill	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4120131				0	Fontana Ave	Riverside County Line	Lime Ave	Widen Fontana Ave from Valley Blvd to Lime Ave from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	FONTANA	4A07014				0	Fontana Ave	Valley	Poplar	Widen Fontana Ave from Valley Blvd to Poplar Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A04102				0	Foothill Bl	Hemlock	Almeria	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120168				0	Foothill Bl	Vineyard	Archibald Ave	Widen Foothill Bl from Vineyard to Archibald Av from 4 to 6 lanes									3 in each direction								X	
San Bernardino	Local Highway	FONTANA	4120132				0	Foothill Blvd	East Ave	Cherry Ave	Widen Foothill Blvd from East Ave to Cherry Avd from 2 to 3 lanes on eastbound side									1 lane eastbound								X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120166				0	Foothill Blvd	Archibald to Herm	Hermosa	Widen Foothill Blvd from Archibald to Hermosa from 4 to 6 lanes									3 in each direction								X	
San Bernardino	Local Highway	REDLANDS	4A01243				0	Ford St	5th Ave	I-10	Widen Ford St from 5th Ave to I-10 from 2 lanes to 4 lanes									2 in each direction								X	

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	CHINO	4A01273				0	Francis Av	LA County Line	Chino City Limit	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4120100				0	Francis Ave	600' e/o Snyder	Benson Av	Widen Francis Ave from 600' e/o Snyder to Benson Ave from 2 to 4 lanes									2 lanes in each direction						X			
San Bernardino	Local Highway	CHINO	4120099				0	Francis Ave	WCL	600' e/o Concord Ct	Widen Francis Ave from WCL to 600' e/o Concord Ct from 2 to 4 lanes (S. Side Only)									2 extra lanes on south side only						X			
San Bernardino	Local Highway	CHINO	4A01272				0	Francis Ave	0.11 m w/o East End	0.13 e/o Telephone Ave	Widen Francis Ave from .11 m w/o East End to .13 m e/o Telephone Ave from 2 to 4 lanes									2 lanes in each direction						X			
San Bernardino	Local Highway	ONTARIO	4A01203				0	Francis St	Benson Av	Campus Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	ONTARIO	4A07227				0	Francis St			Construct a Bridge on Francis St over West Cucamonga Creek									Exist Config: No crossing					X				
San Bernardino	Local Highway	FONTANA	4A01104				0	Frontage Rd (I-15)	Duncan Canyon Rd	Riverside Av	New road, 2 lanes each dir									Exist Config: Does not exist					X				
San Bernardino	Local Highway	REDLANDS	4A07352				0	Garnet St	.08 m s/o Mentone Av	Mentone Av	Widen Garnet St from .08 m s/o Mentone Av to Mentone Av from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	REDLANDS	4A07320				0	Garnet St	Mentone Av	SR 38	Widen Garnet St from Mentone Av to SR 38 from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	REDLANDS	4A07169				0	Garnet St	Newport Av	Florida St	Widen Garnet St from Newport Av to Florida St from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	REDLANDS	4A07314				0	Garnet St	SR-38	Newport Ave	Widen Garnet St from SR-38 to Newport Ave from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07127				0	Glen Helen Pkwy	Glen Helen Pkwy	NW/End	Widen Glen Helen Rd from Glen Helen Pkwy to NW/END from 2 to 4 lanes									2 in each direction							X		
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4G0161				0	Glen Helen Pkwy	in San Bernardino County	(Cajon)	Roadway Widening (Low Option), Grade Separation (High Option)														X				
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07018				0	Glen Helen Pkwy	Lytle Creek Rd	Nely/Cajon	Widen Glen Helen Pkwy from Lytle Creek to Nely/Cajon Blvd from 2 to 4 lanes									2 in each direction							X		
San Bernardino	Local Highway	CHINO	4A07144				0	Grand Ave	East End Rd	Ramona Ave	Widen Grand Ave from East End Rd to Ramona Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07011				0	Green Tree Blvd	Hesperia Rd	Ridgecrest Rd	At ATS&F Railroad Construct 4-lane Bridge; widen Green Tree D to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	HIGHLAND	4A01173				0	Greenspot Rd	Gold Buckle	Santa Ana River	Widen from 2 to 4 lanes (EXCLUDING BRIDGE)									Exist Config: 2 lanes						X			
San Bernardino	Local Highway	HIGHLAND	4A07044				0	Greenspot Rd	Orange St	BOULDER	Widen from 4 to 6 lanes									Exist Config: Deficient 4 lanes						X			
San Bernardino	Local Highway	REDLANDS	4A07295				0	Greenspot Rd	.15 m n/o Florida St	Florida St	Widen Greenspot Rd from .15 m n/o Florida St to Florida St from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	HIGHLAND	4A07019				0	Greenspot Rd Branch	Santa Ana River	Bryant	Construct new street, Greenspot Rd to connect to Bryant from 0 to 2 lanes within City Limit									Exist Config: 0 lanes						X			
San Bernardino	Local Highway	ONTARIO	4A04207				0	Grove Av	Airport Dr	Holt Blvd	Widen existing grade separation from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120160				0	Grove Ave	8th	Tapia Via	Widen Grove Ave from 8th To Tapia Via (east side) from 1 to 2 lanes									3 lanes total - 1 on east side only							X		
San Bernardino	Local Highway	ONTARIO	4A04206				0	Grove Ave from Riverside Dr to Merrill Ave from 2 to 4 lanes	Riverside Dr	Merrill Ave	Widen Grove Ave from Riverside Dr to Merrill Ave from 2 to 4 lanes									2 lane in each direction									X
San Bernardino	Local Highway	ONTARIO	4120146				0	Grove Ave from s/o 4Th St to 350' n/o Holt Blvd from 4 to 6 lanes	s/o 4th St	350' n/o Holt Blvd	Widen Grove Ave from s/o 4Th St to 350' n/o Holt Blvd from 4 to 6 lanes									3 lane in each direction									X
San Bernardino	Local Highway	COLTON	4G0157				0	H St	in Colton	BNSF Crossing	Safety Upgrade (Low Option), Safety Upgrade (High Option)									At grade-removing grade crossing will be culdesac				X					
San Bernardino	Local Highway	ONTARIO	4A04208				0	Haven Ave from Riverside Dr to Bellegrave Ave from 2 to 4 lanes	Riverside Dr	Bellegrave Ave	Widen Haven Ave from Riverside Dr to Bellegrave Ave from 2 to 4 lanes									2 lane in each direction									X
San Bernardino	Local Highway	ADELANTO	4120049				0	Helendale	Desert Flower	Oleander	Widen Helendale from Desert Flower to Oleander									Widen from 2 to 4 lanes; 2 in each direction							X		
San Bernardino	Local Highway	CHINO	4A04038				0	Hellman Ave	Kimball	Chino Corona Rd	Widen from 1 to 2 lanes each dir									Exist Config: Most of the road does not exist.					X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120158				0	Helman	Cucamonga Creek Channel		Widen Helman at Cucamonga Creek Channel (50%RC, 50% Ontario)									1 to 2 lanes 2 in each direction							X		
San Bernardino	Local Highway	HESPERIA	4A01152				0	Hesperia Rd	Bear Valley	Yucca St	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction					X				
San Bernardino	Local Highway	HESPERIA	4A07206				0	Hesperia Rd	Walnut	Sultana	Widen Hesperia Rd from Walnut to Sultana from 2 to 4 lanes									Exist Config: 1 lane in each direction							X		
San Bernardino	Local Highway	HESPERIA	4A07129				0	Hesperia Rd	Yucca St.	Walnut Ave	Widen Hesperia Rd from Yucca to Walnut from 2 to 4 lanes									Exist Config: 1 lane each direction							X		
San Bernardino	Local Highway	REDLANDS	4A07261				0	Highland Av	Cajon St	Redlands Bl	Widen Highland from Cajon to Redlands Bl from 3 to 4 lanes									Exist Config: 1 lane each direction									X
San Bernardino	Local Highway	REDLANDS	4A01244				0	Highland Av	Redlands Bl	Ford St	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction							X		
San Bernardino	Local Highway	HIGHLAND	4A07136				0	Highland Ave	Church St	Boulder Ave	Widen Highland Ave from Church St to Boulder Ave from 2 to 4 lanes									Exist Config: 2 lanes					X				
San Bernardino	Local Highway	ADELANTO	4120051				0	Holly Road	Amethyst	US-395	Widen Holly Road from Amethyst to US-395									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120050				0	Holly Road	Aster	Richardson	Widen Holly Road from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120052				0	Holly Road	Richardson Rd	Lessing	Widen Holly Road from Richardson to Lessing									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120053				0	Holly Road	US-395	Aster	Widen Holly Road from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ONTARIO	4A07035				0	Holt Blvd			Construct a Bridge on Holt Blvd over West Cucamonga Creek									Exist Config: No crossing					X				
San Bernardino	Local Highway	VICTORVILLE	4A01325				0	Hook Bl	US-395	Amethyst Rd	Widen Hook from US 395 to 0.4 miles west of Amethyst 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07383				0	Hook Blvd	1680' w/o Emerald Rd	At Power Line Easement	Widen Hook Blvd from 1680' w/o Emerald Rd to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07389				0	Hook Blvd	1820' e/o US-395	At Power Line Easement	Widen Hook Blvd from 1820' e/o US-395 to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07387				0	Hopland St	Just w/o Amethyst Rd	At Power Line Easement	Widen Hopland St from Just w/o Amethyst Rd to At Power Line Easement from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07309				0	Hopland St	US-395	Cobalt Rd	Widen Hopland St from US-395 to Cobalt Rd from 0 to 4 lanes (Victorville portion only)									Exist Config: New road						X			
San Bernardino	Local Highway	ONTARIO	4A01212				0	Inland Empire Bl	Vineyard Av	Archibald Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	FONTANA	4A01107				0	Jurupa Av	Etiwanda Av	Live Oak Sierra	Widen from 1 to 3 lanes each dir									Exist Config: 1 lane each direction			X						
San Bernardino	Local Highway	FONTANA	4A07165				0	Jurupa Av	Locust Ave	Cedar Ave	Widen Jurupa Ave from Locust Ave to Cedar Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	RIALTO	4A07111				0	Jurupa Ave	Cedar Ave	Lilac Ave	Widen Jurupa Ave from Cedar Ave to Lilac Ave from 2 to 4 lanes									2 in each direction							X		

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	FONTANA	4A07299				0	Jurupa Ave	Lilac Ave	Willow Ave	Widen Jurupa Ave from Lilac Ave to Willow Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07250				0	Jurupa Ave	Tamarind Ave	Alder Ave	Widen Jurupa Ave from Tamarind Ave to Alder Ave from 2 to 6 lanes									3 in each direction								X	
San Bernardino	Local Highway	ONTARIO	4A01213				0	Jurupa St	Turner Av	Archibald Av	Widen Jurupa St from Turner Ave to Archibald Ave from 2 to 6 lanes									3 lane in each direction				X					
San Bernardino	Local Highway	COLTON	4A01068				0	K and L Streets	3rd St	5th St	Widen to 1 lane each dir									Exist Config: 2 Lane Local Street			X						
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4120189				0	Kendall Dr	Cambridge	Campus Pkwy	Widen Kendall Dr from Cambridge Ave to Campus Pkwy from 2 to 4 lanes									Exist Config: 2 lanes each direction with 2-way left turn lane								X	
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07086				0	Kendall Dr	Cambridge Ave	Pine Ave	Widen Kendall Dr from Cambridge Ave to Pine Ave from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07060				0	Kendall Dr	Palm Ave	Cajon Blvd	Widen Kendall Dr from Palm Ave to Cajon Blvd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07052				0	Kimball	Euclid	Hellman	Widen Kimball from Euclid to Hellman from 2 to 4 lanes									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	APPLE VALLEY	4A07070				0	Kiowa Rd	Ocotillo Rd	Bear Valley Rd	Widen Kiowa Rd from Ocotillo Rd to Bear Valley Rd from 2 to 4 lanes									Exist Config: 1 lane in each direction							X		
San Bernardino	Local Highway	APPLE VALLEY	4A04017				0	Kiowa Rd	Yucca Loma Rd	Bear Valley Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction			X						
San Bernardino	Local Highway	ADELANTO	4120055				0	Koala	Air Expressway	El Mirage Rd	Widen Koala from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120054				0	Koala	Cactus	Air Expressway	Widen Koala from Cactus to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120058				0	Koala	Colusa	Oleander	Widen Koala from Colusa to Oleander									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120057				0	Koala	El Mirage Rd	Colusa Rd	Widen Koala from El Mirage to Colusa									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120056				0	Koala	Palmdale Rd	Villa	Widen Koala from Palmdale to Villa									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4A04411				0	Koala Rd	El Mirage Rd	Desoto Rd	New road, 1 lane each dir									Exist Config:								X	
San Bernardino	Local Highway	ADELANTO	4A04410				0	Koala Rd	Holly Rd	El Mirage Rd	Widen from 2 to 4 lanes each dir									Exist Config:								X	
San Bernardino	Local Highway	ADELANTO	4A04409				0	Koala Rd	Palmdale Rd	Holly Rd	New road, 2 lanes each dir									Exist Config:								X	
San Bernardino	Local Highway	COLTON	4A01069				0	La Cadena Dr	Rancho Av	South City Limits	Widen from 2 to 3 lanes each dir									Exist Config: 4 Lane Major Arterial Street						X			
San Bernardino	Local Highway	COLTON	4120114				0	La Cadena Dr	Palm Ave	Iowa Ave	Widen La Cadena Dr from Palm Ave to Iowa Ave from 4 to 6 lanes									3 lane in each direction								X	
San Bernardino	Local Highway	COLTON	4120115				0	La Cadena Dr	Rancho Ave	Litton Ave	Widen La Cadena Dr from Rancho Av to Litton Ave from 4 lanes to 6 lanes									3 lane in each direction								X	
San Bernardino	Local Highway	VICTORVILLE	4A07382				0	La Mesa Rd	2010' e/o Topaz Rd	At Power Line Easement	Widen La Mesa Rd from 2010' e/o Topaz Rd to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07092				0	La Mesa Rd	Baldy Mesa	Cantina	Widen La Mesa Rd from Baldy Mesa to Cantina Dr from 0 lanes to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07224				0	La Mesa Rd	Caughlin Rd	White Rd	Widen La Mesa Rd from Caughlin Rd to White Rd frm 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07288				0	La Mesa Rd	White Rd	Baldy Mesa Rd	Widen La Mesa Rd from White Rd to Baldy Mesa Rd from 0 to 4 lanes (Victorville portion only)									Exist Config: New road						X			
San Bernardino	Local Highway	HIGHLAND	4A07231				0	Lankershim Av	660' n/o Base Line	1200' n/o 9th St	New Road Construction									Exist Config: Does Not Exist. Post Construction: 2 lane road, 1 lane each direction.						X			
San Bernardino	Local Highway	TWENTYNINE PALMS	4A01293				0	Lear Av/Sunfair Rd	Poleline Rd	MCAS	New road, 2 lanes each dir									Exist Config: No Road there currently			X						
San Bernardino	Local Highway	HESPERIA	4A01155				0	Lemon St	Mauna Loa	Mojave River	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction								X	
San Bernardino	Local Highway	BARSTOW	4A0803				0	LENWOOD RD	400 FEET NORTH OF BNSF RR	600 FEET SOUTH OF BNSF RR	WIDEN FROM 4 LANES TO 6 LANES (3 EA DIR)									Note: widening to 4 lanes complete by 2012 under RTIP# 200622				X					
San Bernardino	Local Highway	ADELANTO	4120059				0	Lessing	Holly Rd	Bartlett Rd	Widen Lessing from Holly to Bartlett									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	RIALTO	4120184				0	Linden Ave	Baseline	Easton Ave	Widen Linden Ave from Baseline to Easton Ave from 0 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07177				0	Little League Dr	I-215 Frontage Rd	Belmont Ave	Widen Little League Dr from I-215 Frontage Rd to Belmont Ave (including culvert) from 2 to 4 lanes									Exist Config: 1 lane each direction								X	
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07134				0	Little League Dr	Palm Ave	I-215 Frontage Rd	Widen Little League Dr from Palm Ave to I-215 Frontage Rd from 2 to 4 lanes									Exist Config: 1 lane each direction								X	
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07308				0	Little Mountain Dr	Devil Creek Channel	48th St	Widen Little Mountain Dr from Devil Creek Channel to 48th St from 2 to 4 lanes									Exist Config: 2 lanes each direction								X	
San Bernardino	Local Highway	FONTANA	4120133				0	Live Oak	Jurupa Ave	Slover Ave	Widen Live Oak Ave from Jurupa Ave to Slover Ave from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	FONTANA	4A07187				0	Live Oak Ave	Arrow Route	Foothill	Widen Live Oak Ave from Arrow Route to Foothill from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	YUCAIPA	4A01371				0	Live Oak Cyn Rd	West City Limit	I-10	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4A01245				0	Live Oak Cyn Rd	San Timoteo Cyn Rd	E. City Limits	Widen Live Oak Cyn Rd from San Timoteo Cyn Rd to E. City Limits from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	FONTANA	4A04110				0	Live Oak Rd	Valley Bl	Merrill	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	RIALTO	4120185				0	Locust Ave	Baseline	Easton Ave	Widen Locust Ave from Baseline to Easton Ave from 0 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	FONTANA	4A07183				0	Locust Ave	Jurupa Ave	Santa Ana Ave	Widen Locust Ave from Jurupa Ave to Santa Ana Ave from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	RIALTO	4A07188				0	Locust Ave	San Bernardino Ave	Randall Ave	Widen Locust Ave from San Bernardino Ave to Randall Ave from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	RIALTO	4A07193				0	Locust Ave	Santa Ana Ave	Slover Ave	Widen Locust Ave from Santa Ana Ave to Slover Ave from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	FONTANA	4A07315				0	Locust Ave	Seventh St	Eleventh St	Widen Locust Ave from Seventh St to Eleventh St from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07189				0	Locust Ave	Valley Blvd	San Bernardino Ave	Widen Locust Ave from Valley Blvd to San Bernardino Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07255				0	Lugonia Ave	Alabama St	Tennesee St	Widen Lugonia Ave from Alabama St to Tennesee St from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07229				0	Lugonia Ave	California	Alabama	Widen Lugonia Ave from California St to Alabama St from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4120174				0	Lugonia Ave	Orange St	Wabash Ave	Widen Lugonia Ave from Orange St to Wabash Ave from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	REDLANDS	4A01246				0	Lugonia Ave	Tenessee St	Orange St	Widen Lugonia Ave from Tenessee St to Orange St from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	FONTANA	4A07045				0	Lytle Creek	Summit Ave	Duncan Ave	Widen Lytle Creek from Summit Ave to Duncan Ave from 0 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	HESPERIA	4A07217				0	Main St	11th St	7th St	Widen Main St from 11th St to 7th St from 4 to 6 lanes									Exist Config: 2 lane in each direction									X
San Bernardino	Local Highway	HESPERIA	4A01158				0	Main St	I-15	Escondido Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lane in each direction				X					
San Bernardino	Local Highway	HESPERIA	4A01157				0	Main St	I-15	US Hwy 395	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction						X			
San Bernardino	Local Highway	GRAND TERRACE	4G04027				0	Main St	in Grand Terrace	(San Bernardino)	Grade Separation at Main St in Grand Terrace on the San Bernardino Line									Widen from 2-4 lanes								X	
San Bernardino	Local Highway	GRAND TERRACE	4A07356				0	Main St.[w.b.]	S.F.R.R.	WCL	Widen Main St (w.b.) from SFRR to WCL from 1 to 2 lanes									Exist Config: one lane in each direction			X						
San Bernardino	Local Highway	GRAND TERRACE	200807	200807	0	0	0	MAIN STREET			MAIN STREET WIDENING - BNSF TO WEST CITY LIMITS-WIDENING FROM 1-2 LANES IN THE E/B & W/B DIRECTION-(BRIDGE WIDENING AND APPROACHES OF ABOUT 100' IN EACH DIRECTION"	Main St	n/a	BNSF	WEST CITY LIMITS	WIDENING FROM 1-2 LANES IN THE E/B & W/B DIRECTION-(BRIDGE WIDENING AND APPROACHES OF ABOUT 100' IN EACH DIRECTION"	1	2					X			
San Bernardino	Local Highway	HESPERIA	4A01159				0	Maple Av	Eucalyptus Av	Main St	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction								X	

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment: Route Name	Roadway Segment: Length	Roadway Segment: From	Roadway Segment: To	Roadway Segment: Description	Roadway Segment: Existing Lanes	Roadway Segment: Proposed Lanes	Transit Segment: Route	Additional Details	RTP Baseline	Network Year (Project Completion By): 2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	HESPERIA	4A07090				0	Mariposa	Eucalyptus	Bear Valley Rd	Widen Mariposa from Eucalyptus to Bear Valley Rd from 2 to 4 lanes									Exist Config: 1 lane in each direction							X	
San Bernardino	Local Highway	VICTORVILLE	4A07332				0	Mariposa Rd	Palmdale Rd	Yates Rd	Widen Mariposa Rd from 0.2 mi. s/o Palmdale Rd to Yates Rd.									Exist Config:					X			
San Bernardino	Local Highway	HESPERIA	4G0429				0	Mauna Loa	3rd Ave	1 Ave	Grade Separation-Adding lanes from 0-4									Exist Config: No existing crossing at this location							X	
San Bernardino	Local Highway	HESPERIA	4A01161				0	Mauna Loa	7th Av	Lemon St	New road, 2 lanes each dir									Exist Config: No roadway exists								X
San Bernardino	Local Highway	HESPERIA	4A01162				0	Mauna Loa	Maple Av	7th Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction								X
San Bernardino	Local Highway	RIALTO	4A07120				0	Merrill	West City Limits	Riverside	Widen Merrill Ave from West City Limits to Riverside from 2 to 4 lanes									Exist Config:				X				
San Bernardino	Local Highway	FONTANA	4A04114				0	Merrill Av	Catawba	Fontana Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X			
San Bernardino	Local Highway	CHINO	4A01040				0	Merrill Av	Euclid Av	East City Limit	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X			
San Bernardino	Local Highway	FONTANA	4A07055				0	Merrill Ave	Cherry	Catawba	Widen Merrill Ave from Cherry Av to Catawba from 2 to 4 lanes									Exist Config: 1 lane each direction					X			
San Bernardino	Local Highway	ONTARIO	4A01214				0	Merrill Ave from Grove Ave to Milliken Ave (Hamner Ave) from 2 to 4 lanes	Grove Ave	Milliken Ave	Widen Merrill Ave from Grove Ave to Milliken Ave (Hamner Ave) from 2 to 4 lanes									2 lanes in each direction							X	
San Bernardino	Local Highway	HESPERIA	4A01163				0	Mesquite St	Topaz Av	Maple Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction						X		
San Bernardino	Local Highway	GRAND TERRACE	4120140				0	Michigan St	Commerce Way	Van Buren	Widen Michigan St from Commerce Way and Van Buren St from 2 lanes to 4 lanes.									2 lanes in each direction			X					
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07131				0	Midway Avenue	SH 18/N	SH247	Pave Dirt Road 1 lane in each direction									Exist Config: Dirt Road between SH 18 & SH 247					X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07243				0	Mill	Pepper Av	Meridian	Widen Mill from Pepper to Meridian from 2 to 4 lanes									Exist Config: 1 lane each direction							X	
San Bernardino	Local Highway	ONTARIO	4A04214				0	Mill Creek Ave from Riverside to Bellgrave	Riverside	Bellgrave	Widen Mill Creek Ave from Riverside to Bellgrave 2-4 lanes									2 lanes in each direction							X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120167				0	Miller Rd	Etiwanda Ave to	East St	Widen Miller Rd from Etiwanda Ave to East St from 2 to 4 lanes									2 in each direction							X	
San Bernardino	Local Highway	ONTARIO	4G0117				0	Milliken Av	in Ontario	(Los Angeles)	Safety Upgrade (Low Option), Grade Separation (High Option)-Widen 4-6 lanes									1 lane in each direction				X				
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120150				0	Milliken Ave	5th St	700' South	Widen Milliken Ave from 5th St to 700' south (west side)									2 lanes in each direction							X	
San Bernardino	Local Highway	ONTARIO	4A04215				0	Milliken Ave (Hamner Ave) from Edison Ave to S. City Limits from 2 to 6 lanes	Edison Ave	S. City limits	Widen Milliken Ave (Hamner Ave) from Edison Ave to S. City Limits from 2 to 6 lanes									3 lane in each direction							X	
San Bernardino	Local Highway	ONTARIO	4A04216				0	Milliken Ave (Hamner Ave) from Riverside Ave to Edison Ave from 2 to 8 lanes	Riverside Ave	Edison Ave	Widen Milliken Ave (Hamner Ave) from Riverside Ave to Edison Ave from 2 to 8 lanes									4 lanes in each direction total							X	
San Bernardino	Local Highway	ONTARIO	4A07233				0	Mission Blvd	Benson Av	Milliken Ave	Widen Mission Blvd from Benson to Milliken from 4 to 6 lanes									Exist Config: 2 lanes each direction					X			
San Bernardino	Local Highway	MONTCLAIR	4A07182				0	Mission Blvd from Central to Benson from 4 to 6 lanes	Central	Benson	Widen Mission Blvd from Central to Benson from 4 to 6 lanes									3 lane in each direction							X	
San Bernardino	Local Highway	MONTCLAIR	4A01276				0	Mission Blvd from LA County Line to Pipe Line from 2 to 6 lanes	LA County Line	Pipe Line	Widen Mission Blvd from LA County Line to Pipe Line from 2 to 6 lanes									3 lane in each direction							X	
San Bernardino	Local Highway	VICTORVILLE	4A07312				0	Mojave Dr	1000' e/o El Evado Rd	At Power Line Easement	Widen Mojave Dr from 1000' e/o El Evado Rd to At Power Line Easement from 4 to 6 lanes									Exist Config: 2 lanes each direction					X			
San Bernardino	Local Highway	VICTORVILLE	4A07388				0	Mojave Dr	1150' e/o US-395	At Power Line Easement	Widen Mojave Dr from 1150' e/ US-395 to At Power Line Easement from 4 to 6 lanes									Exist Config: 2 lanes each direction					X			
San Bernardino	Local Highway	VICTORVILLE	4A07377				0	Mojave Dr	Just w/o Cobalt Rd	At Power Line Easement	Widen Mojave Dr from just w/o Cobalt Rd to At Power Line Easement from 4 to 6 lanes									Exist Config: 2 lanes each direction					X			
San Bernardino	Local Highway	ADELANTO	4120060				0	Mojave Drive	Aster	Richardson	Widen Mojave Drive from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction							X	
San Bernardino	Local Highway	ADELANTO	4120062				0	Mojave Drive	Richardson Rd	Lessing	Widen Mojave Drive from Richardson to Lessing									Widen from 2 to 4 lanes; 2 in each direction							X	
San Bernardino	Local Highway	ADELANTO	4120061				0	Mojave Drive	US-395	Aster	Widen Mojave Drive from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction							X	
San Bernardino	Local Highway	HESPERIA	4A01165				0	Mojave St	I-15	Maple Av	Widen from 1 to 2 lanes each dir									Exist Config: Existing dirt					X			
San Bernardino	Local Highway	MONTCLAIR	4A07202				0	Monte Vista Ave from Phillips Blvd to State St from 2 to 4 lanes	Phillips Blvd	State St	Widen Monte Vista Ave from Phillips Blvd to State St from 2 to 4 lanes									1 lane in each direction							X	
San Bernardino	Local Highway	MONTCLAIR	4A01183				0	Monte Vista Ave from San Bernardino St to Arrow Hwy from 4 to 6 lanes	San Bernardino St	Arrow Hwy	Widen Monte Vista Ave from San Bernardino St to Arrow Hwy from 4 to 6 lanes									3 lane in each direction							X	
San Bernardino	Local Highway	CHINO	4A07329				0	Mountain Av	Bickmore	El Prado	Widen Mountain Avenue from Bickmore to El Prado									Exist Config: 1 lane each direction					X			
San Bernardino	Local Highway	CHINO	4A07172				0	Mountain Av	Chino	Edison	Widen Mountain from Chino to Edison from 2 to 4 lanes									Exist Config: 1 lane each direction				X				
San Bernardino	Local Highway	CHINO	4A01041				0	Mountain Av	Philadelphia St	Riverside Dr	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction							X	
San Bernardino	Local Highway	ONTARIO	4120147				0	Mountain Ave	Brooks St	Sixth St	Widen from 4 to 6 lanes													X				
San Bernardino	Local Highway	CHINO	4120107				0	Mountain Ave	Schaefer Ave	Edison	Widen Mountain Ave from Schaefer Ave to Edison Ave from 2 to 4 lanes									2 lanes in each direction							X	
San Bernardino	Local Highway	REDLANDS	4120175				0	Mountain View Ave	Lugonia	San Bernardino	Widen Mountain View Ave from Lugonia to San Bernardino from 1 to 2 lanes (east side)									3 lanes total - 1 on east side only					X			
San Bernardino	Local Highway	GRAND TERRACE	4A07289				0	Mt Vernon Av	Barton Rd	700' n/o Minona St	Widen Mt Vernon Av from Barton Rd 700' n/o Minona St from 2 lanes to 4 lanes.									Exist Config: two lanes southbound/1 lane northbound				X				
San Bernardino	Local Highway	GRAND TERRACE	4A01146				0	Mt Vernon Av	Canal St	North City Limits	Widen from 1 to 2 lanes each dir									Exist Config: two lanes southbound/1 lane northbound				X				
San Bernardino	Local Highway	COLTON	4A04071				0	Mt Vernon Av	La Cadena Dr	I-215	Widen from 2 to 4 lanes each dir									Exist Config: 4 Lane Major Arterial Street					X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07264				0	Mt View	Thompson Pl	Electric Av	Widen Mt View Ave from Thompson Pl to Electric Ave from 2 to 4 lanes									Exist Config: 1 lane each direction							X	

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07211				0	Mt View Av	I-10	San Bernardino Av	Widen Mt View Av from I-10 to San Bernardino Av from 2 to 4 lanes (WEST SIDE ONLY)									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4120190				0	Mt View Ave	Railway Crossing		Widen Mt View Ave at railway crossing from 2 to 4 lanes, including gate improvements									2 in each direction								X	
San Bernardino	Local Highway	GRAND TERRACE	200808	200808	0	0	0	MT. VERNON			MT. VERNON AVEN. WIDENING - WIDEN FROM 1-2 LANES NORTHBOUND FROM RAVEN WAY TO PICO ST.	MT VERNON	0	RAVEN	PICO	WIDEN FROM 1-2 LANES N/B	1	2			X		X						
San Bernardino	Local Highway	COLTON	200856	200856	0	0	0	MT. VERNON BRIDGE			MT. VERNON BRIDGE OVER UPRR -ON MT. VERNON AVE. FROM "M" ST TO I-10 ON RAMP. WIDENING BRIDGE FROM 2-4 LANES (CA338)	MT. VERNON BRIDGE	n/a	M ST.	I-10 ON RAMP	WIDEN BRIDGE FROM 2-4 LANES	2	4							X				
San Bernardino	Local Highway	FONTANA	4A04401				0	Mulberry	Jurupa Av	Slover Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A04115				0	Mulberry	Valley Bl	San Bernardino Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07271				0	Mulberry Ave	Jurupa	Santa Ana	Mulberry Ave from Jurupa Ave to Santa Ana Ave Widen from 2 to 4 lanes									Exist Config: 1 lane each direction			X						
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4G07420				0	National Trails	at Oro Grande Grade Sep	Widen underpass from 2-4 lanes	Replace Grade Separation and widen underpass from 2-4 lanes									2 lanes in ea direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07239				0	National Trails Hwy	Mojave River	1.6 mi. n/o Mojave River	Widen National Trails Highway from Mojave River to 1.6 mi. n/o Mojave River - 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A01339				0	National Trails Hwy	Mojave River	I-15	Widen from 1 to 2 lanes each dir (note: overlaps RTIP#5BDB8140 from Air Expwy to I-15)									Exist Config: 1 lane each direction			X						
San Bernardino	Local Highway	VICTORVILLE	4A07025				0	National Trails Hwy	Mojave River		Widen National Trails Highway Bridge over Mojave River (replace existing bridge)									Exist Config:						X			
San Bernardino	Local Highway	VICTORVILLE	4120235				0	National Trails Hwy	0.63 mi n/o Air Expressway	2.21 mi. n/o Air Expwy	Widen National Trails Hwy from 0.63 mi n/o Air Expressway to 2.21 mi. n/o Air Expwy									2 in each direction						X			
San Bernardino	Local Highway	APPLE VALLEY	4A07071				0	Navajo Rd	SR-18	Thunderbird Rd	Widen Navajo Rd from SR-18 to Thunderbird Rd from 2 to 4 lanes									Exist Config: 1 lane in each direction					X				
San Bernardino	Local Highway	REDLANDS	4A07112				0	Nevada St	Lugonia Ave	Palmetto	Widen Nevada St from Lugonia Ave to Palmetto from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07093				0	New Connector	3rd St	5th st	Build a connector road between 3rd St and 5th Sc from 0 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	YUCAIPA	4A07041				0	Oak Glen Rd	Colorado St	Casa Blanca Ave	Widen Oak Glen Rd from Colorado St to Casa Blanca Ave from 2 to 4 lanes									Exist Config: 1 lane each direction								X	
San Bernardino	Local Highway	ADELANTO	4120063				0	Oleander	Aster	Caughlin Rd	Widen Oleander from Aster to Caughlin									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120064				0	Oleander	ECL	Adelanto Rd	Widen Oleander from ECL to Adelanto Rd									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	CALTRANS	4A07197				0	Olive Street	0007M W, Jackson	E/0003M W Rancho Ave	Widen Olive Street from 0007M W, Jackson E/0003M W, Rancho Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	ONTARIO	4A04218				0	Ontario/Hellman Ave from Riverside Dr to Bellgrave from 2 to 4 lanes	Riverside Dr.	Bellgrave	Widen Ontario/Hellman Ave from Riverside Dr to Bellgrave from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	REDLANDS	4120176				0	Orange St	I-10	Lugoina Ave	Widen Orange St from I-10 to Lugoina Ave from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	REDLANDS	4A01248				0	Orange St	Lugonia Ave	San Bernardino Ave	Widen Orange St from Lugonia Ave to San Bernardino Ave from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	REDLANDS	4A01247				0	Orange St	Pioneer Ave	N. City Limits	Widen Orange St from Pioneer Ave to N. City Limits from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	REDLANDS	4120177				0	Orange St	San Bernardino Ave	Pioneer Ave	Widen Orange St from San Bernardino Ave to Pioneer Ave from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07054				0	Orange St	Colton Av	Lugonia Av	Widen from 1 to 2 lanes each dir - Caltrans (State Route 38)									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07360				0	Ottawa St	Hesperia Rd	Industrial Blvd	Widen Ottawa St from Hesperia Rd to Industrial Blvd from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A01343				0	Ottawa St	Mariposa Rd	Ottawa Pl	Widen Ottawa St from Mariposa Rd to Ottawa Pl from 0 to 4 lanes									Exist Config: New road				X					
San Bernardino	Local Highway	HIGHLAND	4A07275				0	Pacific St	2 Lots w/o Cole	Palm Ave	Widen from 2 to 4 lanes									Exist Config: 2 lanes						X			
San Bernardino	Local Highway	HIGHLAND	4A01340				0	Palm Av	3rd St	Baseline	Widen from 2 to 4 lanes									Exist Config: 2 lanes						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07247				0	Palm Av	Cajon Blvd	I-215	Widen Palm Av from Cajon Blvd to I-215 from 2 to 4 lanes,									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	HIGHLAND	4A07323				0	Palm Av	Pacific Ave	Atlantic Ave	Widen Palm Ave from Pacific St to Atlantic Ave from 2 lanes to 4 lanes.									Exist Config: 2 lanes						X			
San Bernardino	Local Highway	SANBAG	200850	200850	0		0	PALM AVE			PALM AVE. GRADE SEPARATION . PALM AVE. APPROX. 530' S/O I-215 PALM AVE. INTERCHANGE TO APPROX. 1450' S/O CAJON BLVD. - CONSTRUCT AT GRADE RR SEPARATION - BUILD BRIDGE OVERCROSSING SEPARATING TRAFFIC FROM RR CROSSING [NO ADDITIONAL LANES] 2-2 LANES [CA615]	n/a	n/a	n/a	n/a	n/a	n/a	n/a					X				
San Bernardino	Local Highway	ADELANTO	4120067				0	Palmdale Rd	Aster	Richardson	Widen Palmdale Rd from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	ADELANTO	4120066				0	Palmdale Rd	Richardson Rd	Lessing	Widen Palmdale Rd from Richardson to Lessing									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	VICTORVILLE	4A07023				0	Palmdale Rd	US 395	I-15	Widen Palmdale Rd from US 395 to I-15 from 4 to 6 lanes. 8.5 lane miles									Exist Config: 2 lanes each direction								X	
San Bernardino	Local Highway	ADELANTO	4120065				0	Palmdale Rd	US-395	Aster	Widen Palmdale Rd from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	REDLANDS	4A07154				0	Palmetto Ave	California St	Alabama St	Widen Palmetto Ave from California St to Alabama St from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	RIALTO	4A07068				0	Pepper	Foothill	SR-210	Widen Pepper Ave from Foothill Blvd to SR-210 from 2 to 4 lanes									Exist Config:									X
San Bernardino	Local Highway	RIALTO	4A07265				0	Pepper	Rialto	Foothill	Widen Pepper Ave from Rialto Ave to Foothill Blvd from 2 to 4 lanes									Exist Config:									X
San Bernardino	Local Highway	RIALTO	4120186				0	Pepper Ave	N. Terminus	Highland Ave	Widen Pepper Ave from N. Terminus to Highland Ave from 2 to 4 lanes									2 in each direction				X					
San Bernardino	Local Highway	RIALTO	4A07200				0	Pepper Ave	Slover	Valley	Widen Pepper Av from Slover to Valley from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	COLTON	4120112				0	Pepper Ave	I-10	Agua Mansa Rd	Widen and extend Pepper Ave from I-10 to Agua Mansa Rd from 0/2 to 4 lanes									new connection in sections then widening rest 1 lane in each direction								X	
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07198				0	Perris Hill Park Rd	21st St	Pacific St	Widen Perris Hill Park Rd from 21st St to Pacific St from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A01278				0	Phelan Rd	Sheep Creek Rd	Baldy Mesa Rd	Widen from 1 to 3 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07191				0	Philadelphia	East End Av	Norton Ave	Widen Philadelphia Av from East End Av to Norton Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07293				0	Philadelphia	Los Angeles Crl	East End Av	Widen Philadelphia Av from Los Angeles Crl to East End Av from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07269				0	Philadelphia	Ramona	Monte Vista	Widen Philadelphia Av from Ramona to Monte Vista from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A01042				0	Philadelphia St	Central Av	Benson Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	CHINO	4A01043				0	Philadelphia St	LA County Line	Central Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	ONTARIO	4A07138				0	Philadelphia St	Vineyard Av	Cucamonga Creek	Widen from 1 to 2 lanes each dir, incl. bridge over cucamonga creek									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	ONTARIO	4A07266				0	Philadelphia St from Campus Ave to 750' e/o Grove Ave from 2 to 4 lanes	Campus Ave	750' e/o Grove Ave	Widen Philadelphia St from Campus Ave to 750' e/o Grove Ave from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	CHINO	4A07252				0	Phillips Blvd	East End Ave	Roswell Ave	Widen Phillips Blvd from East End Ave to Roswell Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07124				0	Phillips Blvd	Roswell Ave	Yorba Ave	Widen Phillips Blvd from Roswell Ave to Yorba Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07107				0	Phillips Blvd	Yorba Av	Benson Av	Widen Phillips Blvd from Yorba Av to Benson Av from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	MONTCLAIR	4A07390				0	Phillips Blvd from LA County Line to East End Ave from 2 to 4 lanes	LA County Line	East End Ave	Widen Phillips Blvd from LA County Line to East End Ave from 2 to 4 lanes									2 lane in each direction								X	
San Bernardino	Local Highway	CHINO	4A04045				0	Pine Av	Euclid Av	Hellman	Widen from 1 to 3 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07244				0	Pine Av	Kendall Dr	Belmont Av	Widen Pine Ave from Kendall Dr to Belmont Ave from 2 to 4 lanes									Exist Config: 1 lane each direction								X	
San Bernardino	Local Highway	CHINO	4A04044				0	Pine Av	SR-71	Euclid Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 Lane each direction. Connection to SR71 not complete.						X			
San Bernardino	Local Highway	CHINO HILLS	4A07116				0	Pine Ave	SR-71	Chino Creek	Widen Pine Ave from Sr-71 to Chino Creek (north side only) in conjunction with Chino project id 200207									Exist Config: 4 lane arterial					X				
San Bernardino	Local Highway	VICTORVILLE	4C01001				0	Pine Ave (Four Corners)	Pine Ave.	Riverside County Line	New arterial corridor linking Pine Ave, Schleisman Ave, Arlington Ave (Riv. Co.)									Exist Config:								X	
San Bernardino	Local Highway	CHINO	4A07216				0	Pipeline Ave	China Av	Riverside Dr	Widen Pipeline Av from China Ave to Riverside Dr from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07059				0	Pipeline Ave	Philadelphia	Mission Blvd	Widen Pipeline Av from Philadelphia Av to Mission Blvd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07279				0	Pipeline Ave	Riverside	Walnut	Widen Pipeline Av from Riverside Av to Walnut Av from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A07303				0	Pipeline Ave	Walnut	.25 m North	Widen Pipeline Av from Walnut Av to .25 m North from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4120134				0	Poplar Ave	Slover Ave	Valley Blvd	Widen Poplar Ave from Slover Ave to Valley Blvd from 0 to 4 lanes (I-10 Overcrossing)									2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120069				0	Raccoon	Air Expressway	El Mirage Rd	Widen Raccoon from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120071				0	Raccoon	Cactus	Air Expressway	Widen Raccoon from Cactus to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120068				0	Raccoon	Colusa	Oleander	Widen Raccoon from Colusa to Oleander									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120070				0	Raccoon	El Mirage Rd	Colusa Rd	Widen Raccoon from El Mirage to Colusa									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120072				0	Raccoon	Palmdale Rd	Villa	Widen Raccoon from Palmdale to Villa									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	CHINO	4A07151				0	Ramona	Philadelphia	Phillips Blvd	Widen Ramona Av from Philadelphia to Philips Blvd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	APPLE VALLEY	4A07032				0	Rancherias Rd	Rincon	Corwin Rd	Widen Rancherias Rd from Rincon Rd to Corwin Rd from 2 to 4 lanes									Exist Config: mostly 1 lane in each direction, small portion not built yet							X		
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200815	200815	0	0	0	RANCHERO STREET			RANCHERO ST. FROM .3 M E/O MARIPOSA TO HESPERIA CL (3 MILES)-WIDEN 2-4 LANES	RANCHERO STREET	3 MILES	0.3 MILES E/O MARIPOSA	HESPERIA	WIDENING	2	4						X					
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07148				0	Rancho	Colton City Limits	5th St	Widen Rancho from Colton City Limits to 5th St from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07351				0	Rancho Rd	2025' e/o Gasline Rd	At Power Line Easement	Widen Rancho Rd from 2025' e/o Gasline Rd to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07160				0	Rancho Rd	Amargosa	National Trails Hwy	Widen Rancho from Amargosa to National Trails Hwy from 0 to 4 lanes (includes was crossing)									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07382				0	Rancho Rd	Amethyst	El Evado Rd	Widen Rancho Rd from Amethyst Rd to El Evado Rd from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07257				0	Rancho Rd	Just w/o El Evado Rd	At Power Line Easement	Widen Rancho Rd from Just w/o El Evado to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07376				0	Rancho Rd	Just w/o Village Dr	At Power Line Easement	Widen Rancho Rd from Just w/o Village Dr to At Power Line Easement from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	ADELANTO	4A04412				0	Rancho Rd	Koala Rd	Caughlin Rd	New road, 2 lanes each dir plus turning lane									Exist Config:						X			
San Bernardino	Local Highway	VICTORVILLE	4A01362				0	Rancho Rd	National Trails Hwy	Stoddard Wells Rd	Widen Rancho Rd from National Trails Hwy to Stoddard wells Rd from 0 to 4 lanes.									Exist Config: New road			X						
San Bernardino	Local Highway	VICTORVILLE	4A07301				0	Rancho Rd	Pacoima	At Power Line Easement	Widen Rancho Rd from Pacoima to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	ADELANTO	4120074				0	Rancho Road	Amethyst	US-395	Widen Rancho Road from Amethyst to US-395									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120073				0	Rancho Road	Aster	Richardson	Widen Rancho Road from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120075				0	Rancho Road	Richardson Rd	Lessing	Widen Rancho Road from Richardson to Lessing									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120076				0	Rancho Road	US-395	Aster	Widen Rancho Road from US-395 to Aster									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	FONTANA	4A07222				0	Randall Ave	Alder	Cedar	Widen Randall Ave from Alder Ave to Cedar Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4120135				0	Randall Ave	Alder Ave	Locust Ave	Widen Randall Ave from Alder Ave to Locust Ave from 2 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	FONTANA	4A07061				0	Randall Ave	Cherry Av	Poplar Ave	Widen Randall Ave from Cherry Av to Poplar Av from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200843	200843	0	0	0	RECHE CANYON			RECHE CANYON RD. FROM 1.20 MILES OF S. BARTON ROAD TO 0.42 MILES SOUTH OF BARTON RD (.078 MILES)-WIDEN FROM 2-4 LANES	RECHE CANYON RD.	0.078 MILES	1.20 MILES OF S BARTON ROAD	0.42 MILES SOUTH OF BARTON RD	WIDENING	2	4						X					
San Bernardino	Local Highway	COLTON	4A04077				0	Reche Canyon Rd	Barton Rd	City Limits	Widen from 2 to 3 lanes each dir									Exist Config: 2 Lane Major Arterial Street					X				
San Bernardino	Local Highway	COLTON	4A07204				0	Reche Cnyn Rd	1.2m s/o Barton Rd	0.78m North Barton Rd	Widen Reche Cnyn Rd from 1.2m s/o Barton Rd to .78m North from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	COLTON	4A07313				0	Reche Cnyn Rd	S. Crystal Ridge	Riverside County Line	Widen Reche Cnyn Rd from S. Crystal Ridge to Riverside County Line from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	COLTON	4120116				0	Reche Cnyn Rd	Washington St.	City Limits	Widen and realign Reche Cnyn Rd from Washington St to City Limits from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	REDLANDS	4A01249				0	Redlands Bl	West City Limits	Colton Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction								X	
San Bernardino	Local Highway	REDLANDS	4120178				0	Redlands Blvd	Alabama St	Colton Av	Widen Redlands Blvd at Intersections of Alabama St and Colton Ave									2 in each direction						X			
San Bernardino	Local Highway	RIALTO	4120180				0	Renaissance Pkwy	Alder Ave	Ayala Dr	Realign and reconstruct Renaissance Pkwy from Alder Ave to Ayala Dr									2 in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07135				0	Rialto	Lena Rd	Tippecanoe	Widen Rialto Av from Lena Rd to Tippecanoe Av from 2 to 4 lanes									Exist Config: 1 lane each direction								X	
San Bernardino	Local Highway	RIALTO	4A07199				0	Rialto	Riverside	East City Limits	Widen Rialto Ave from Riverside Ave to East City Limits from 2 to 4 lanes									Exist Config:					X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07178				0	Rialto Ave	Sierra Wy	Waterman Ave	Widen Rialto Ave from Sierra Wy to Waterman Ave from 2 to 4 lanes									2 in each direction						X			

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment: Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Transit Segment: Route	Additional Details	RTP Baseline	Network Year (Project Completion By): 2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	ADELANTO	4120079				0	Richardson	Air Expressway	El Mirage Rd	Widen Richardson from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120077				0	Richardson	Colusa	Oleander	Widen Richardson from Colusa to Oleander									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120078				0	Richardson	El Mirage Rd	Colusa Rd	Widen Richardson from El Mirage to Colusa									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120080				0	Richardson	Mojave Dr	Air Expressway	Widen Richardson from Mojave to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120081				0	Richardson	Palmdale Rd	Victor	Widen Richardson from Palmdale to Victor									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	RIALTO	4A07237				0	Riverside	Locust	Cedar	Widen Riverside Ave from Locust Ave to Cedar Ave from 3 to 4 lanes									Exist Config:				X					
San Bernardino	Local Highway	COLTON	4A01079				0	Riverside Av	Riverside County Line	North City Limit	Widen from 2 to 3 lanes each dir									Exist Config: 4 Lane Major Arterial Street								X	
San Bernardino	Local Highway	RIALTO	4A01258				0	Riverside Av	South City Limit	Slover Av	Widen from 2 to 3 lanes each dir									Exist Config:								X	
San Bernardino	Local Highway	RIALTO	4A01259				0	Riverside Av	Valley Bl	n/o Slover Av	Widen from 2 to 4 lanes each dir [note: overlaps RTP#SBD31808]									Exist Config:			X						
San Bernardino	Local Highway	RIALTO	4120187				0	Riverside Ave	Gateway Plaza	San Bernardino Ave	Widen Riverside Ave from Gateway Plaza to San Bernardino Ave from 4 to 6 lanes									3 in each direction				X					
San Bernardino	Local Highway	RIALTO	4120188				0	Riverside Ave	Sierra Ave	Alder Ave	Widen Riverside Ave from Sierra Ave to Alder Ave from 3 to 6 lanes									3 in each direction					X				
San Bernardino	Local Highway	COLTON	4120117				0	Riverside Ave	Riverside County Line	Santa Ana River	Widen Riverside Ave from Riv. County Line to Santa Ana River from 4 to 6 lanes									1 lane in each direction								X	
San Bernardino	Local Highway	COLTON	4120118				0	Riverside Ave	Santa Ana River	Agua Mansa Rd	Widen Riverside Ave from Santa Ana River to Agua Mansa Rd from 4 to 6 lanes									3 lane in each direction								X	
San Bernardino	Local Highway	CHINO	4A01046				0	Riverside Dr	Benson Av	Magnolia Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	CHINO	4A01047				0	Riverside Dr	Fern Av	Euclid Av	Widen from 1 to 3 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	CHINO	4A01048				0	Riverside Dr	Mountain Av	Magnolia Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	CHINO	4A01049				0	Riverside Dr	Pipeline	Fern Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	CHINO	4A01050				0	Riverside Dr	West City Limits	Benson Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	CHINO	4120101				0	Riverside Dr	Central Ave	Mountain Ave	Widen Riverside Dr from Central Ave to Mountain Av from 4 to 6 lanes									3 lane in each direction					X				
San Bernardino	Local Highway	CHINO	4120107				0	Riverside Dr	Mountain Ave	Fern Ave	Widen Riverside Dr from Mountain Ave to Fern Ave from 2 to 6 lanes									3 lane in each direction					X				
San Bernardino	Local Highway	CHINO	4120103				0	Riverside Dr	Pipeline	Central Ave	Widen Riverside Dr from Pipeline Ave to Central Ave from 4 to 6 lanes									1 lane in each direction					X				
San Bernardino	Local Highway	CHINO	4120108				0	Riverside Dr	WCL	800' e/o Reservior Ave	Widen Riverside Dr from WCL to 800' e/o Reservior Ave from 4 to 6 lanes (N. Side Only)									2 lanes on North side					X				
San Bernardino	Local Highway	ONTARIO	4A04219				0	Riverside Dr from Euclid Ave to Milliken Ave from 2 to 4 lanes	Euclid Ave	Milliken Ave	Widen Riverside Dr from Euclid Ave to Milliken Ave from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	HESPERIA	4A01168				0	Rock Springs Rd	Glendale Ave	E City Limits	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction						X			
San Bernardino	Local Highway	APPLE VALLEY	4A07082				0	Rock Springs Rd	Mojave River Cl	Kiowa Rd	Widen Rock Springs Rd from Mojave River Crl to Kiowa Rd from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	APPLE VALLEY	4A07123				0	Rock Springs Rd	Glendale Ave	Mojave River Crl	Widen Rock Springs Rd from Glendale Ave to Mojave River Crl from 2 lanes to 4 lanes									2 lanes in each direction					X				
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200816	200816	0	0	0	ROCK SPRINGS RD.			ROCK SPRINGS RD. FROM 0.25 MI. E/O GLENDALE AVE. TO KIOWA (1.86 MILES) WIDEN FROM 2-4 LANES	ROCK SPRINGS ROAD	1.86 MILES	0.25 MI. E/O GLENDALE AVE.	KIOWA	WIDENING	2	4					X					
San Bernardino	Local Highway	APPLE VALLEY	4A07058				0	Roundup Wy	Kiowa	Central	Widen Roundup Wy from Kiowa Rd to Central from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	ONTARIO	4G0103/ 4G0109				0	San Antonio Av	in Ontario	(Alhambra) (Los Angeles)	Spot Widening (Low Option), Grade Separation (High Option) Widen 2-4 lanes									1 lane in each direction									X
San Bernardino	Local Highway	RIALTO	4A07101				0	San Bernardino	West City Limits	East City Limits	Widen San Bernardino from West City Limits to East City Limits from 2 to 4 lanes									Exist Config:					X				
San Bernardino	Local Highway	REDLANDS	4A01281				0	San Bernardino Av	Alabama St	California St	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction							X		
San Bernardino	Local Highway	COLTON	4A01080				0	San Bernardino Av	Pepper Av	Meridian Av	Widen from 1 to 2 lanes each dir														X				
San Bernardino	Local Highway	REDLANDS	4A01252				0	San Bernardino Av	Route 30	Orange St	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction			X						
San Bernardino	Local Highway	REDLANDS	4A07147				0	San Bernardino Ave	Alabama St	Redlands Crl	Widen San Bernardino Ave from Alabama St to Redlands Crl from 2 to 6 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4A07033				0	San Bernardino Ave	Alder Ave	Laurel Ave	Widen San Bernardino Ave from Alder Ave to Laurel Ave from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4A07072				0	San Bernardino Ave	Cherry Ave	Fontana City Limits Avenue	Widen San Bernardino Ave from Cherry Ave to Fontana City Limits from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	REDLANDS	4A01250				0	San Bernardino Ave	Church St	Wabash Ave	Widen San Bernardino Ave from Church St to Wabash Ave from 2 to 4 lanes									2 in each direction							X		
San Bernardino	Local Highway	COLTON	4120119				0	San Bernardino Ave	County Limit	Rancho Ave	Widen San Bernardino Ave from County Limit to Rancho Ave from 2 to 4 lanes									2 lanes in each direction					X				
San Bernardino	Local Highway	FONTANA	4A07109				0	San Bernardino Ave	Etiwanda Ave	Cherry Ave	Widen San Bernardino Ave from Etiwanda Ave to Cherry Ave from 5 to 6 lanes									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	RIALTO	4A07079				0	San Bernardino Ave	Laurel Ave	Rialto City Limits	Widen San Bernardino Ave from Laurel Ave to Rialto City Limits from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	REDLANDS	4120179				0	San Bernardino Ave	SR-210	Orange St	Widen San Bernardino Ave from SR-210 to Orange St from 2 to 4 lanes									2 in each direction							X		
San Bernardino	Local Highway	REDLANDS	4A07240				0	San Bernardino Ave	Wabash Av	Opal Av	Widen San Bernardino Av from Wabash Av to Opal Av from 2 to 4 lanes									2 in each direction							X		
San Bernardino	Local Highway	COLTON	4120120				0	San Bernardino Ave	Pepper Ave	County Limit	Widen San Bernardino Ave from Pepper Ave to County Limit from 2 lanes to 4 lanes									2 lanes in each direction					X				
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200835	200835	0	0	0	SAN BERNARDINO AVE.			SAN BERNARDINO AVE. FROM CHERRY AVE. TO FONTANA CITY LIMITS (LIME AVE.) (1.25 MILES)-WIDEN 2-4 LANES	SAN BERNARDINO AVE	1.25 MILES	CHERRY AVE.	FONTANA CITY LIMITS (LIME AVE)	WIDEN FROM 2-4 LANES	2	4			X		X					

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	MONTCLAIR	4A01184				0	San Bernardino St from LA County Line to Benson Ave from 4 to 6 lanes	LA County Lane	Benson Ave	Widen San Bernardino St from LA County Line to Benson Ave from 4 to 6 lanes									3 lane in each direction									X	
San Bernardino	Local Highway	FONTANA	4A07084				0	San Sevaine	Baseline	Summit	San Sevaine Rd from Baseline Ave to Summit Ave Widen from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	REDLANDS	4A01254				0	San Timoteo Cyn Rd	RR Crossing	Live Oak Cyn Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction									X	
San Bernardino	Local Highway	FONTANA	4A07132				0	Santa Ana Ave	Cedar Ave	Cactus Ave	Widen Santa Ana Ave from Cedar Ave to Cactus Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07159				0	Santa Ana Ave	Locust	Cedar	Widen Santa Ana Ave from Locust Ave to Cedar Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4A07158				0	Santa Ana Ave	Mulberry Ave	Redwood Ave	Widen Santa Ana Av from Mulberry Ave to Redwood Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	FONTANA	4120136				0	Santa Ana Ave	Mullberry Ave	Almond Ave	Widen Santa Ana Ave from Mullberry Ave to Almond Ave from 2 to 4 lanes									2 in each direction									X	
San Bernardino	Local Highway	FONTANA	4A07153				0	Santa Ana Ave	Tamarind	Locust	Widen Santa Ana Ave from Tamarind to Locust Ave from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	CHINO	4A01051				0	Schaefer Av	Benson Av	Euclid Av	Widen from 1 to 2 lanes each dir									Exist Config: Partially completed			X						
San Bernardino	Local Highway	ONTARIO	4A04220				0	Schaefer Ave from Euclid Ave to Edison Ave from 2 to 4 lanes	Euclid Ave	Edison Ave	Widen Schaefer Ave from Euclid Ave to Edison Ave from 2 to 4 lanes									2 lanes in each direction									X	
San Bernardino	Local Highway	VICTORVILLE	4A07367				0	Seneca Rd	0.4 m e/o Hesperia Rd	Road B	Widen Seneca Rd from .4 m e/o Hesperia Rd to Road B from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07350				0	Seneca Rd	2340 w/o El Evado Rd	At Power Line Easement	Widen Seneca Rd from 2340' w/o El Evado Rd to At Power Line Easement from 3 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07365				0	Seneca Rd	2360' e/o US-395	At Power Line Easement	Widen Seneca Rd from 2360' e/o US-395 to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07384				0	Seneca Rd	650' w/o Emerald Rd	At Power Line Easement	Widen Seneca Rd from 650' w/o Emerald Rd to At Power Line Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	ADELANTO	4120083				0	Seneca Rd	Aster	Richardson	Widen Seneca Rd from Aster to Richardson									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	VICTORVILLE	4A07113				0	Seneca Rd	Emerald Rd	Amethyst Rd	Widen Seneca Rd from Emerald Rd to Amethyst Rd from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	VICTORVILLE	4A07378				0	Seneca Rd	Hesperia Rd	2 m e/o Hesperia Rd	Widen Seneca Rd from Hesperia Rd to 0.2 m e/o Hesperia Rd from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	ADELANTO	4120084				0	Seneca Rd	Richardson Rd	Caughlin Rd	Widen Seneca Rd from Richardson to Caughlin									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	ADELANTO	4120082				0	Seneca Rd	US-395	Daisy	Widen Seneca Rd from US-395 to Daisy									Widen from 2 to 4 lanes; 2 in each direction								X	
San Bernardino	Local Highway	VICTORVILLE	4A01354				0	Seneca Rd	US-395	Topaz	Widen Seneca Rd from US-395 to Topaz from 0 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	HESPERIA	4A04420				0	SH 247	Aberdeen	Linn	Widen within ROW to accommodate passing lanes									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4S0067				0	Shadow Mt	Helendale Rd	NTH	Grade Separation Bridge over Mojave widen to 4 lanes									New Config				X					
San Bernardino	Local Highway	FONTANA	4A01284A				0	Sierra Av	I-15	Lytle Creek Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4A04122				0	Sierra Av	San Bernardino Av	Foothill Blvd	Widen from 2 to 3 lanes each dir									Exist Config: 2 lane each direction				X					
San Bernardino	Local Highway	FONTANA	4A04123				0	Sierra Av	Slover Av	Valley Bl	Widen from 3 to 4 lanes each dir									Exist Config: 3 lanes each direction				X					
San Bernardino	Local Highway	FONTANA	4A04125				0	Sierra Av	Summit Av	I-15	Widen from 1 to 3 lanes each dir									Exist Config: 1 lane each direction			X						
San Bernardino	Local Highway	RIALTO	4A01284B				0	Sierra Ave	I-15	Lytle Creek Rd	Widen Sierra Ave from I-15 to Lytle Creed Rd from 3 to 4 lanes									2 in each direction							X		
San Bernardino	Local Highway	FONTANA	4A07034				0	Sierra Lakes Pkwy	Cherry	Almeria	Sierra Lakes Pkwy from Cherry Ave to Almeria Ave Widen from 2 to 4 lanes									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	FONTANA	4120137				0	Sierra Lakes Pkwy	Cherry Ave	Beech Ave	Widen Sierra Lakes Pkwy from Cherry Ave to Beech Ave from 2 to 4 lanes									3 lane in each direction									X
San Bernardino	Local Highway	APPLE VALLEY	4A07026				0	Sitting Bull Rd	Apple Valley Rd	Navajo Rd	Widen Sitting Bull Rd from Apple Valley Rd to Navajo Rd from 2 to 4 lanes									Exist Config: 1 lane in each direction						X		
San Bernardino	Local Highway	COLTON	4120121				0	Slover	Pepper Ave	Riverside Ave	Widen Slover from Pepper Ave to Riverside Ave from 2 to 4 lanes									2 lanes in each direction							X	
San Bernardino	Local Highway	FONTANA	4A01285				0	Slover Av	Alder Av	Cactus Av	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction					X			
San Bernardino	Local Highway	RIALTO	4A01260				0	Slover Av	Cactus Av	Riverside Av	Widen from 1 to 2 lanes each dir									Exist Config:					X			
San Bernardino	Local Highway	FONTANA	4A07259				0	Slover Av	Tamarind	E. City Limits	Slover Av from Tamarind Av to E. City Limits Widen from 4 to 6 lanes									Exist Config: 2 lane each direction				X					
San Bernardino	Local Highway	VICTORVILLE	4A07075				0	Smoketree Rd	Topaz Rd	Amargosa Rd	Widen Smoketree Rd from Topaz Rd to Amargosa Rd from 0 to 4 lanes (includes wash crossing)									Exist Config: New road					X			
San Bernardino	Local Highway	FONTANA	4A07103				0	So. Highland Av	Baseline	Cherry	So. Highland from Baseline Rd to Cherry Av Widen from 0 lanes to 4 lanes.									Exist Config: Does not exitt					X				
San Bernardino	Local Highway	FONTANA	4A07166				0	So. Highland Av	Sierra	Palmetto	So. Highland Ave from Sierra Ave to Palmetto Ave Widen from 2 to 4 lanes									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	ONTARIO	200804	200804	0		0	SOUTH ARCHIBALD			SOUTH ARCHIBALD AVE. GRADE SEPARATION [AT MISSION BLVD] CONSTRUCT A HIGHWAY AND RR GRADE SEPARTION AT EXISTING AT-GRADE CROSSING SOUTH OF ARCHIBALD AND THE UPPR LA LINE-PROJECT TO BUILD NEW FLY-OVER BRIDGE FOR RR - WIDENING FROM 2-6 LANES 3 LANES IN EACH DIRECTION AND LEFT AND RIGHT TURN LANES;DRAINAGE IMPROVMENTS	SOUTH ARCHIBALD AVE.	n/a	AT MISSION BLVD.	n/a	WIDEN 2-6 LANES.	2	6				X				
San Bernardino	Local Highway	VICTORVILLE	4A07043				0	Spring Valley Pkwy	Huerta Rd	Driftwood Dr	Widen Spring Valley Pkwy from Huerta Rd to Driftwood Dr from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07031				0	State St	Foothill Blvd	I-215	Widen State St from Foothill Blvd to I-215 from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4120191				0	State St	Highland Ave	n/o Cajon Blvd	Widen State St from Highland Ave to n/o Cajon Blvd from 2 lanes to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200824	200824	0	0	0	STATE ST.			STATE STREET FROM ADAMS NORTH TO NOLAN/SHORT ST. (1.44 MILES) WIDEN FROM 2-4 LANES - GRADE SEPARATION	STATE STREET	1.44 MILES	ADAMS NORTH	NOLAN/SHORT ST	WIDENING/GRADE SEPARATION	2	4			X		X						
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07050				0	State Street	In San Bernardino County		Widen to Ultimate									Exist Config: 1 lane in each direction Vertical profile					X			
San Bernardino	Local Highway	LOMA LINDA	200801	200801	0	0	0	STEWART STREET			STEWART STREET WIDENING WIDEN FROM 2-4 LANES FROM ANDERSON TO CAMPUS ST.	STEWART STREET	n/a	ANDERSON STREET	CAMPUS STREET	WIDENING	2	4					X						
San Bernardino	Local Highway	VICTORVILLE	4A07359				0	Stoddard Wells	Dante St	I-15	Widen Stoddard Wells from Dante St to Osborne Rd, 0.56 mi. s/o I-15, from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	VICTORVILLE	4A07171				0	Stoddard Wells Rd	Los Padres	I-15	Widen Stoddard Wells Rd from Los Padres Rd to I-15 from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4A07167				0	Summit Av	Cherry Av	San Sevaine	Summit Av from Cherry Av to San Sevaine Widen from 2 lanes to 4 lanes.									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	CALTRANS	4A07053				0	Summit Valley Rd	1.88m n/o SH-138	n/o SH-138 2.18m	Widen Summit Valley Rd from 1.88m N, SR-138 N 2.18m (HSP CL)									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	HESPERIA	4A07095				0	Summit Valley Rd	4.31m n/o SH-138	N/o SH-138 1.20m	Widen Summit Valley Rd from 4.31M N, SR-138 (HSP CL) N 1.20M (HSP CL)									Exist Config: 1 lane in each direction							X		

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	CALTRANS	4A07117				0	Summit Valley Rd	4.31m n/o SH-138	N/o SH-138 1.20m	Widen Summit Valley Rd from 4 31M N, SR-138 (HSP CL) N 1.20M (HSP CL)									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07097				0	Summit Valley Rd	SH 138	N1.88 miles To Ranchero Rd	Widen Summit Valley Rd from SR-138 to Ranchero Rd from 2 to 4 lanes									Exist Config: 1 lane each direction									X
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07013				0	Sunburst Avenue	SH62,N	Crestview	Widen existing traffic lanes: adjust vertical Profile safety									Exist Config: I lane in each direction Vertical profile					X				
San Bernardino	Local Highway	VICTORVILLE	4120226				0	Third Ave	0.25 m s/o Nisqualli Rd	Nisqualli Rd	Widen Third Ave from .25 m s/o Nisqualli Rd to Nisqualli Rd from 2 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	VICTORVILLE	4120227				0	Third Ave	575' s/o Nisqualli Rd	Silica Dr	Widen Third Ave from 575' s/o Nisqualli Rd to Silica Dr from 0 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	VICTORVILLE	4120228				0	Third Ave	600' n/o Bear Valley Rd	Bear Valley Rd	Widen Third Ave from 600' n/o Bear Valley Rd to Bear Valley Rd from 0 to 4 lanes									2 in each direction									X
San Bernardino	Local Highway	APPLE VALLEY	4A01018				0	Thunderbird Rd	Rancherias Rd	Central Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane in each direction					X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07152				0	Tippecanoe	Mill St	Harriman	Widen Tippecanoe from Mill St to Harriman from 4 to 6 lanes									Exist Config: 2 lanes each direction			X						
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07005				0	Tippecanoe Ave	San Bernardino Ave	Santa Ana River	Widen Bridge from 4 to 6 Lanes									Exist Config: 2 lanes each direction						X			
San Bernardino	Local Highway	CHINO HILLS	4C01002				0	Tonner Canyon (Four Corners)	Grand	SR-57	New arterial corridor connecting Chino Hills with SR-57 (LA/OR Co.) with 2 lanes each dir, access to SR-57 at Brea Cyn Rd or Tonner Cyn Rd, connection to Grand Ave and Eucalyptus Ave, no connection to Valencia Ave									Exist Config: n/a							X	
San Bernardino	Local Highway	VICTORVILLE	4A07379				0	Topaz Rd	360' n/o Seneca Rd	At power line easement	Widen Topaz Rd from 360' n/o Seneca Rd to At Powerline Easement from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07283				0	Topaz Rd	Eucalyptus	Smoketree Rd	Widen Topaz Rd from Eucalyptus Rd to Smoketree Rd from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A07164				0	Topaz Rd	Hopland	Luna Rd	Widen Topaz Rd from Hopland St to Luna Road from 0 to 4 lanes									Exist Config: New road						X			
San Bernardino	Local Highway	VICTORVILLE	4A01361				0	Topaz Rd	Seneca Rd	Palmdale Rd	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07228				0	University Pkwy	Hallmark Pkwy	BNSF Grade Separation	Widen University Pkwy from Hallmark Pkwy to BNSF Grade Separation from 2 to 4 lanes									Exist Config: 1 lane each direction			X						
San Bernardino	Local Highway	FONTANA	4A07039				0	Valley	Cherry	Alder	Valley Blvd from Cherry to Alder Widen from 2 to 4 lanes													X					
San Bernardino	Local Highway	FONTANA	4A07272				0	Valley Blvd	Almond	Cherry	Valley Blvd from Almond Ave to Cherry Ave Widen from 4 to 6 lanes									Exist Config: 2 lane each direction				X					
San Bernardino	Local Highway	FONTANA	4A07284				0	Valley Blvd	Cherry Ave	Hemlock	Widen Valley Blvd from Cherry Ave to Hemlock Ave from 5 to 6 lanes									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07201				0	Valley Blvd	Etiwanda Ave	Commerce Dr	Widen Valley Blvd from Etiwanda Ave to Commerce Dr from 5 to 6 lanes									Exist Config: 2 lanes each direction					X				
San Bernardino	Local Highway	FONTANA	4120138				0	Valley Blvd	Poplar Ave	Alder Ave	Widen Valley Blvd from Sierra Ave to Alder Ave from 4 to 6 lanes									3 lane in each direction									X
San Bernardino	Local Highway	RIALTO	4A01261				0	Valley Blvd	Spruce Av	Sycamore Av	Widen from 1 to 2 lanes each dir									Exist Config:					X				
San Bernardino	Local Highway	COLTON	4A01082				0	Valley Blvd	Sycamore Av	Mt. Vernon Av	Widen from 2 to 3 lanes each dir									Exist Config: 4 Lane Major Arterial Street						X			
San Bernardino	Local Highway	ADELANTO	4120086				0	Verbena	Air Expressway	El Mirage Rd	Widen Verbena from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	ADELANTO	4120085				0	Verbena	Cactus	Air Expressway	Widen Verbena from Cactus to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	ADELANTO	4120087				0	Verbena	El Mirage Rd	Calleja	Widen Verbena from El Mirage to Calleja									Widen from 2 to 4 lanes; 2 in each direction									X
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120151				0	Victoria Ave	EHS	I-15	Widen Victoria Ave from EHS to I-15									2 lanes in each direction				X					
San Bernardino	Local Highway	ONTARIO	4G0105				0	Vineyard Av	In Ontario	(Alhambra)	Safety Upgrade (Low Option), Grade Separation (High Option) Widen 4-6 lanes									1 lane in each direction					X				
San Bernardino	Local Highway	ONTARIO	4A01222				0	Vineyard Ave from 4th St to I-10 from 4 to 6 lanes	4th St	I-10	Widen Vineyard Ave from 4th St to I-10 from 4 to 6 lanes									3 in each direction							X		
San Bernardino	Local Highway	ONTARIO	4A04223				0	Vineyard Ave from Riverside Dr to Edison Ave from 2 to 6 lanes	Riverside Dr.	Edison Ave	Widen Vineyard Ave from Riverside Dr to Edison Ave from 2 to 6 lanes									3 in each direction							X		
San Bernardino	Local Highway	ADELANTO	4120088				0	Vinton	Air Expressway	El Mirage Rd	Widen Vinton from Air Expressway to El Mirage									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120089				0	Vinton	Desert Flower	Oleander	Widen Vinton from Desert Flower to Oleander									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120091				0	Vinton	El Mirage Rd	Colusa Rd	Widen Vinton from El Mirage to Collusa									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120092				0	Vinton	Mojave Dr	Air Expressway	Widen Vinton from Mojave to Air Expressway									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	ADELANTO	4120090				0	Vinton	Palmdale Rd	Victor	Widen Vinton from Palmdale to Victor									Widen from 2 to 4 lanes; 2 in each direction						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200837	200837	0	0	0	VISTA RD.			VISTA ROAD GRADE SEPARATION-WIDEN 2-4 LANES AND CONSTRUCT GRADE SEPARATION	VISTA ROAD	1 MILE	0.2 MILES WEST OF NATIONAL TRAILS HIGHWAY	0.2 MILES WEST OF NATIONAL TRAILS HIGHWAY	GRADE SEPARATION	2	4						X					
San Bernardino	Local Highway	LOMA LINDA	4A07196				0	W. Van Leuven St.	Evans St.	Orange Grove St.	New road, 1 lanes each dir									Exist Config: Does not exist			X						
San Bernardino	Local Highway	APPLE VALLEY	4A07029				0	Waalew Rd	Corwin Rd	Central	Widen Waalew Rd from Corwin Rd to Central Rd from 2 to 4 lanes									Exist Config: 1 lane in each direction					X				
San Bernardino	Local Highway	REDLANDS	4A07235				0	Wabash Av	.30 m s/o Seventh St	.13m n/o Seventh St	Widen Wabash Av from .30 m s/o Seventh St to .13m n/o Seventh St from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07321				0	Wabash Av	6th Av to 5th Av from	5th Av	Widen Wabash Av from 6th Av to 5th Av from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	~~COLTON~~ Redlands	4A07253				0	Wabash Av	Colton Av	SR 38	Widen Wabash Av from Colton Av to SR 38 from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07381				0	Wabash Av	Redlands City limits	I-10	Widen Wabash Av from Redlands City Limits to I-10 from 2 to 4 lanes									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	REDLANDS	4A07254				0	Wabash Av	SR-38 to San Bernardino	San Bernardino	Widen Wabash Av from SR-38 to San Bernardino Ave from 2 to 4 lanes									2 in each direction						X			
San Bernardino	Local Highway	ONTARIO	4A04224				0	Walker Ave from Riverside to S. City Limit	Riverside	S. City Limits	Widen Walker Ave from Riverside to S. City Limit									2 lanes in each direction							X		
San Bernardino	Local Highway	FONTANA	4A07077				0	Walnut	I-15	San Servaine	Walnut Ave from I-15 to San Servaine from 2 to 4 lanes									Exist Config: 1 lane each direction					X				
San Bernardino	Local Highway	FONTANA	4A04137				0	Walnut Av	Almeria	Sierra	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction				X					
San Bernardino	Local Highway	COLTON	4A07194				0	Washington St	Barton Rd	I-215	Widen Washington from Barton Rd to I-215 from 4 to 6 lanes									Exist Config: 4 Lane Major Arterial Street					X				
San Bernardino	Local Highway	COLTON	4120123				0	Washington St	Aqueduct	La Cadena Dr	Widen Washington St to from Aqueduct to La Cadena Dr from 0 to 2 lanes									1 lane in each direction							X		
San Bernardino	Local Highway	COLTON	4120122				0	Washington St	Waterman	I-215	Widen Washington St from Waterman to I-215 from 4 to 6 lanes									3 lanes in each direction							X		
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A01292				0	Waterman Av	5th St	Baseline Av	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction with 2-way left turn lane							X		

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment							Transit Segment	Additional Details	RTP Baseline	Network Year (Project Completion By)							
												Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Route			2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07003				0	Waterman Av/I-10	Hospitality Lane	Redlands Blvd	Replace I-10 Bridge to Widen Waterman Ave from 4 to 6 Lanes									Exist Config: 2 lanes each direction								X	
San Bernardino	Local Highway	YUCAIPA	4A01376A				0	Wildwood Canyon Rd	Calimesa Bl	Colorado St	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	YUCAIPA	4A01376B				0	Wildwood Canyon Rd	Colorado St	Canyon Dr	Widen from 1 to 2 lanes each dir									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	YUCAIPA	4A07022				0	Wildwood Cyn Rd	Outer I-10	Calimesa Blvd New Rd	Widen Wildwood Cyn Rd fromOuter I-10 St to Calimesa Blvd from 2 lanes to 4 lanes.									Exist Config: 1 lane each direction						X			
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120170				0	Wilson Ave	East Ave	Wardman/Bulloch	Widen Wilson Ave from East Ave to Wardman/Bulloch from 0 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	RANCHO CUCAMONGA	4120171				0	Wilson Ave	Milliken	Day Creek Blvd	Widen Wilson Ave from Milliken to Day Creek Blvd from 0 to 4 lanes									2 in each direction								X	
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07051				0	Wilson Ranch Road	Duncan Road	Palmdale	Pave dirt road, 1 lane each dir									Exist Config: Dirt Road						X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A07089	200836	0	0	0	YATES RD.			YATES RD. FROM .24 MILE NORTH OF CHINQUAPIN TO .02 MILES SOUTH OF FORTUNA (1.5 MILES) -WIDEN 2-4 LANES	YATES ROAD	1.5 MILES	0.24 MILES NORTH OF CHINQUAPIN	0.2 MILES SOUTH OF FORTUNA	WIDENING	2	4						X						
San Bernardino	Local Highway	APPLE VALLEY	4120097				0	Yuca Loma Rd	West Town Limits	SR-18	Widen Yuca Loma Rd from West Town Limits to SR-18 from 2 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	YUCAIPA	4A04418				0	Yucaipa Bl	I-10	Bryant St	Widen from 2 to 3 lanes each dir									Exist Config: 2 lanes each direction						X			
San Bernardino	Local Highway	APPLE VALLEY	4120098				0	Yucca Loma Rd (Mojave Br)	Yates Rd	W. Town Limits	Widen Yucca Loma Rd (Mojave Br) from Yates Rd to W Town Limits from 0 to 4 lanes									2 lanes in each direction								X	
San Bernardino	Local Highway	HESPERIA	SBD031284	SBD031284	0	0	0				"I" AVENUE FROM RANCHERO RD TO MAIN ST. WIDEN FROM 2 LANES TO 4 LANES	I AVENUE	n/a	RANCHERO RD.	MAIN ST.	WIDEN	2	4						X						
San Bernardino	Local Highway	COLTON	4A07106	201157	0		0				WASHINGTON ST. FROM .90 MILES WEST OF WASHINGTON ST. TO LA CADENA MT. VERNON CONSTRUCT NEW 4 LANE ROADWAY (FOR PA & ED ONLY)	WASHINGTON STREET	0.50 MILES	WEST END OF WASHINGTON STREET	LA CADENA DRIVE	EXTEND WASHINGTON STREET	n/a	4							X					
San Bernardino	Local Highway	VICTORVILLE	SBD031421	SBD031421	0	0	0				3RD AVENUE BEAR VALLEY TO NISQUALLI ROAD WIDEN FROM 2 LANES TO 4 LANES, EXTEND ROAD WITH 4 LANES	3RD AVENUE	n/a	BEAR VALLEY	NISQUALLI ROAD	WIDEN	2	4			X		X							
San Bernardino	Local Highway	VICTORVILLE	SBD031422	SBD031422	0	0	0				3RD AVENUE NISQUALLI ROAD TO GREEN TREE BOULEVARD WIDEN FROM 2 LANES TO 4 LANES	3RD AVE.	n/a	NISQUALLI	GREEN TREE BLVD	WIDEN	2	4			X			X						
San Bernardino	Local Highway	HIGHLAND	REG0702	201185	0	0	0				3RD STREET FROM VICTORIA AVENUE TO PALM AVENUE - SHOULDER IMPROVEMENTS (REMAINS 4 LANES) (1 MILE) FORMERLY PART OF PROJECT ID 200430	3RD STREET	1 MILE	VICTORIA AVENUE	PALM AVENUE	SHOULDER IMPROVEMENTS	4	4							X					
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	SBD59019	SBD59019	0		0				40TH ST. FROM ACRE LANE TO ELECTRIC AVENUE; ACQUIRE ROW AND WIDEN ROAD FROM 2 TO 4 LANES (1,200 FT.)	40th ST	.23 MILES	ACRE LANE	ELECTRIC AVE	WIDEN 2-4 LANES	2	4							X					
San Bernardino	Local Highway	HIGHLAND	4A01368	201183	0		0				5TH ST FROM TIPPECANOE AVENUE TO VICTORIA AVE.-WIDEN FROM 2-4 LANES	5TH STREET	2 MILES	TIPPECANOE AVENUE	VICTORIA AVENUE	WIDEN	2	4							X					
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4A07119	201170	0	0	0				5TH STREET FROM STERLING AVE TO VICTORIA AVE WIDEN FROM 2-4 LANES.	5TH STREET	1 MILE	STERLING AVE	VICTORIA	WIDEN	2	4							X					
San Bernardino	Local Highway	COLTON	4A07226	201158	0	0	0				AGUA MANSA FROM RIALTO CHANNEL TO RANCHO AVE. 2-4 LANE WIDENING.(PROGRAMMED FUNDING FOR PA & ED ONLY)	AGUA MANSA	1.30 MILES	RIALTO CHANNEL	RANCHO AVE.	WIDENING	2	4							X					
San Bernardino	Local Highway	HIGHLAND	SBD55031	SBD55031	0		0				ALABAMA STREET FROM 3RD STREET TO SOUTH CITY LIMITS - WIDEN FROM 2 TO 3 S/B LANES (0.25 MILES)	ALABAMA STREET	0.25 MILES	3RD STREET	SOUTH CITY LIMITS	WIDEN	2	3							X					
San Bernardino	Local Highway	REDLANDS	200419	200419	0	0	0				ALABAMA STREET WIDENING - WIDEN FROM 2-4 LANES FROM NORTH CITY LIMITS TO 3,000 FT. NORTH PALMETTO	ALABAMA ST	n/a	NORTH CITY LIMITS	3,00' N/O PALMETTO	WIDEN	2	4						X						
San Bernardino	Local Highway	TWENTYNINE PALMS	SBD41427	SBD41427	0	0	0				AMBOY ROAD - LEAR AVE TO ADOBE RD. (5.5 MILES) CONSTRUCT NEW 2 LANE ROAD (ONE LANE IN EACH DIRECTION)	AMBOY RD	5.5 MILES	LEAR	ADOBE	NEW 2 LANE ROAD	n/a	2						X						
San Bernardino	Local Highway	VICTORVILLE	SBD031418	SBD031418	0	0	0				AMETHYST ROAD PALMDALE ROAD TO HOPLAND STREET WIDEN EXISTING ROAD FROM 2 LANES TO 4 LANES	AMETHYST ROAD	n/a	PALMDALE ROAD	HOPLAND STREET	WIDEN	2	4			X		X							
San Bernardino	Local Highway	FONTANA	SBD031233	SBD031233	0	0	0				ARROW BOULEVARD ALDER TO MAPLE AVENUE WIDEN 2 LANES TO 4 LANES	ARROW BLVD	n/a	ALDER AVE	MAPLE AVE	WIDEN FROM 2-4 LANES	2	4			X			X						
San Bernardino	Local Highway	UPLAND	200630	201101	0	0	0				ARROW ROUTE WIDENING FROM 2 TO 4 LANES. BRIDGE AND STREET WIDENING FOR ARROW ROUTE, FROM MONTE VISTA AVENUE TO BENSON AVENUE (PROJECT WAS 200630 IN 2008 RTIP)	Arrow Rt.	2600	Monte Vista	Benson	Widening	2	4					X							
San Bernardino	Local Highway	YUCAIPA	4AL04	2011157	0	0	0				AVENUE E IMPROVEMENTS FROM BRYANT ST. TO 5TH STREET, WIDEN 2-4 LANES	AVENUE E	n/a	BRYANT ST.	5TH STREET	WIDEN 2-4 LANES	2	4					X							
San Bernardino	Local Highway	RIALTO	SBD031361	SBD031361	0	0	0				AYALA DRIVE BASELINE ROAD TO SR210 WIDEN FROM 2 LANES TO 4 LANES	AYALA DRIVE	n/a	SR210	BASELINE	WIDEN FROM 2-4 LANES	2	4			X		X							
San Bernardino	Local Highway	LOMA LINDA	SBD031295	SBD031295	0	0	0				BARTON ROAD EAST CITY LIMITS TO WEST CITY LIMITS WIDEN FROM 4 LANES TO 6 LANES SPOT WIDENINGS	BARTON RD	n/a	EAST CITY LIMITS	WEST CITY LIMITS	WIDEN	4	6						X						
San Bernardino	Local Highway	HIGHLAND	REG0701	201187	0		0				BASE LINE BETWEEN SR-210 RAMPS - WIDEN FROM 4 LANES TO 6 LANES (0.1 MILES) WIDEN SR-210 BRIDGE ON BASE LINE FROM 4 LANES TO 6 LANES	BASELINE	0.1 MILES	BETWEEN SR 210 RAMPS	n/a	BASELINE BETWEEN SR 210 RAMPS, WIDEN 4-6 LANES INCLUDING THE BRIDGE	4	6						X						
San Bernardino	Local Highway	HIGHLAND	4OM0701	201191	0	0	0				BASE LINE FROM SEINE AVENUE TO STONEY CREEK DRIVE - WIDEN FROM 4-6 LANES (0.2 MILES)	BASE LINE	0.2 MILES	SEINE AVENUE	STONEY CREEK DRIVE	WIDEN	4	6							X					
San Bernardino	Local Highway	FONTANA	SBD031217	SBD031217	0	0	0				BEECH AVENUE FOOTHILL TO MILLER AVE WIDEN FROM 2 LANES TO 4 LANES	BEECH AVENUE	n/a	FOOTHILL	MILLER	WIDEN	2	4						X						
San Bernardino	Local Highway	HIGHLAND	200018	200018	0		0				BOULDER AV ACROSS CITY CREEK S/O BASELINE - RECONSTRUCT EXISTING BRIDGE FROM 2 TO 4 LANES; ALSO WIDEN BOULDER AVE FROM 190' NORTH TO 1,430' SOUTH OF BRIDGE FROM 2-4 LANES (54C0648)	BOULDER AVENUE	ABOUT 0.3 MILES	190' NORTH OF BRIDGE	1,430' SOUTH OF BRIDGE	WIDEN BRIDGE FROM 2-4 LANES	2	4			X		X							
San Bernardino	Local Highway	HIGHLAND	SBD55033	SBD55033	0		0				BOULDER AVE. FROM GREENSPOT TO SOUTH CITY LIMITS - WIDEN FROM 2-4 LANES (0.70 MILES)	BOULDER AVENUE	0.7 MILES	GREENSPOT ROAD/5TH ST	SOUTH CITY LIMITS	WIDEN	2	4							X					
San Bernardino	Local Highway	RIALTO	4A01256	2011121	0	0	0				CACTUS WIDENING - WIDEN CACTUS FROM VALLEY TO WALNUT AVENUES FROM 2-4 LANES	CACTUS	n/a	VALLEY	WALNUT	WIDEN 2-4 LANES	2	4			X			X						
San Bernardino	Local Highway	LOMA LINDA	SBD31876	SBD31876	0	0	0				CALIFORNIA STREET BARTON ROAD TO REDLANDS BOULEVARD WIDEN FROM 2 TO 4 LANES	CALIFORNIA STREET	n/a	REDLANDS BOULEVARD	BARTON ROAD	WIDENING	2	4			X				X					
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	SBD59023	SBD59023	0		0				CAMPUS PKWY-PEPPER/LINDEN DRIVE EXTENSION FROM KENDALL TO I-215 FWY - CONSTRUCT (4) LANE ROADWAY - BETWEEN KENDALL DRIVE AND I-215, PARTIAL DIAMOND INTERCHANGE FOR N/B (2,000 FT)	CAMPUS PKWY	n/a	KENDALL DR.	I-215	CONSTRUCT NEW 4 LANE ROAD	n/a	n/a								X			
San Bernardino	Local Highway	FONTANA	4AD4084	201139	0	0	0				CASA GRANDE AVENUE FROM LYTLE CREEK ROAD TO MANGO AVENUE CONSTRUCT 4 LANES	CASA GRANDE AVENUE	n/a	LYTLE CREEK ROAD	MANGO AVENUE	CONSTRUCT NEW ROAD	n/a	4							X					
San Bernardino	Local Highway	RANCHO CUCAMONGA	200023	200023	0	0	0				CHERRY AV FROM SOUTH CITY LIMITS TO WILSON AV - WIDEN FROM 2 TO 4 LANES	CHERRY AVE	0	SOUTH CITY LIMITS	WILSON AVE	WIDENING	2	4			X		X							
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200409	200409	0	0	0				CHERRY AVE. AT SCRRA RR CROSSING - WIDEN BRIDGE FROM 4-6 LANES ON CHERRY OVER RR CROSSING (FROM MERRILL TO WHITTRAM)	CHERRY AVE AT SCRRA RR CROSSING	1 MILE	MERRILL AVE	WHITTRAM	WIDEN BRIDGE FROM 4-6 LANES	4	6							X					
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200410	200410	0	0	0				CHERRY AVE. WIDENING FROM WHITTRAM TO FOOTHILL BLVD. - WIDEN 4-6 LANES	CHERRY AVE.	n/a	WHITTRAM	FOOTHILL	WIDENING	4	6			X		X							
San Bernardino	Local Highway	FONTANA	SBD031190	SBD031190	0		0				CHERRY AVENUE BASELINE AVENUE TO HIGHLAND AVENUE WIDENING STREET FROM 2 LANES TO 6 LANES	CHERRY AVE	n/a	BASELINE	HIGHLAND	WIDEN	2	6			X				X					
San Bernardino	Local Highway	FONTANA	4AD4087	201107	0	0	0				CHERRY AVENUE FROM SOUTH HIGHLAND TO I-15 WIDEN (2-6 LANES)	CHERRY AVENUE	n/a	SOUTH HIGHLAND	I-15	WIDENING	2	6						X						

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment: Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Transit Segment: Route	Additional Details	RTP Baseline	Network Year (Project Completion By): 2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	HESPERIA	200209	200209	0	0	0				IN HESPERIA - PAVE ESCONDIDO ROAD FROM RANCHERO TO CEDAR (2.0 MILES). PAVE 4 LANES OF ROADWAY 2 IN EACH DIRECTION.	ESCONDIDO RD	2 MILES	RANCHERO RD.	CEDAR RD	PAVE 2 LANE DIRT ROAD	n/a	4			X		X						
San Bernardino	Local Highway	HESPERIA	200211	200211	0	0	0				IN HESPERIA ON I STREET FROM MAIN ST. TO BEAR VALLEY RD. APPROX. 4.4 MILES - WIDEN FROM 2-4 LANES	I STREET	4.4	MAIN ST.	BEAR VALLEY RD	WIDEN	2	4						X					
San Bernardino	Local Highway	RANCHO CUCAMONGA	20020134	20020134	0	0	0				IN RANCHO CUCAMONGA - ON ARROW RTE. FROM ETIWANDA AVENUE TO EAST STREET - WIDEN FROM 2-4 LANES (3,200 FEET)	ARROW ROUTE	n/a	ETIWANDA AVE	EAST AVE	WIDEN	2	4			X			X					
San Bernardino	Local Highway	FONTANA	SBD031227	SBD031227	0	0	0				JURUPA AVENUE ETIWANDA TO SIERRA AVENUE CONSTRUCT 6 LANE ROAD	JURUPA AVENUE	n/a	ETIWANDA AVE	SIERRA AVE	CONSTRUCT 6 LANE ROAD	n/a	6			X			X					
San Bernardino	Local Highway	FONTANA	4A04108	201144	0		0				JURUPA AVENUE FROM TAMARIND AVENUE TO ALDER AVENUE WIDEN FROM 2 TO 4 LANES	JURUPA AVENUE	n/a	TAMARIND AVENUE	ALDER AVENUE	WIDEN	2	4							X				
San Bernardino	Local Highway	COLTON	4A01069	20110601	0		0				LA CADENA DR OVER SANTA ANA RIVER, 1.5 MI SOUTH OF I-10 - REPLACE EXISTING 4 LANE BRIDGE WITH 6 LANE BRIDGE (54C0077)	LA CADENA DR	n/a	OVER SANTA ANA RIVER	n/a	1.5 MI SOUTH OF I-10 REPLACE EXISTING 4 LANE BRIDGE WITH 6 LANE BRIDGE	4	6								X			
San Bernardino	Local Highway	HESPERIA	4A01155	201104	0	0	0				LEMON STREET/MAUNA LOA STREET-NEW RR UNDERCROSSING THAT INCLUDES CONSTRUCTION OF A NEW OVERCROSSING BRIDGE AND REALIGNMENT AND RECONSTRUCTION OF LEMON AND MAUNA LOA STREETS FROM 3RD AVE. TO JUST WEST OF E AVE.	LEMON ST./MAUNA LOA ST.	500 FT.	3RD AVENUE	E AVENUE	NEW RAILROAD UNDERCROSSING	n/a	6							X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	200607	200607	0	0	0				LENA ROAD EXTENSION PROJECT - EXTENSION OF LENA RD. FROM MILL ST. TO ORANGE SHOW RD. NEW 4 LANE ROAD (CO-OP PROJECT WITH IVDA)SAFETEA-LU -41701	LENA RD.	n/a	MILL ST.	ORANGE SHOW RD.	NEW 4 LANE ROAD	n/a	4			X		X						
San Bernardino	Local Highway	SANBAG	200622	200622	0		0				LENWOOD GRADE SEPARATION - NORTH OF WEST MAIN ST; APPROX.400 FT. N/O TO 600 FT. S/O BNSF AND SANTA FE RR RIGHT-OF-WAY-4 TRAVEL LANE GRADE SEPARATION (CA627)	LENWOOD AVE	n/a	N OF WEST MAIN ST.	600' N/O TO 600' S/O SANTA FE RR	GRADE SEPARATION WIDENING	2	4						X					
San Bernardino	Local Highway	HESPERIA	SBD55025	SBD55025	0	0	0				MAIN STREET FROM I-15 TO MAPLE (PHASE 1) FROM MAPLE TO 11TH (PHASE 2) - I-15 TO SR 395 (PHASE 3); WIDEN AND RECONSTRUCT FROM 4 - 6 LANES, INCLUDING WIDENING OF BRIDGE OVER CALIFORNIA AQUEDUCT (2.75 MILES)	MAIN ST	2.75 MILES	I-15	US395	WIDEN	4	6			X		X						
San Bernardino	Local Highway	FONTANA	SBD031254	SBD031254	0		0				MERRILL AVENUE ALDER TO MAPLE AVENUE WIDEN FROM 2 TO 4 LANES	MERRILL AVENUE	n/a	ALDER AVENUE	MAPLE AVENUE	WIDEN	2	4			X				X				
San Bernardino	Local Highway	GRAND TERRACE	4A07268	201105	0		0				MICHIGAN AVENUE WIDENING (2-4 LANES) FROM COMMERCE WAY TO MAIN STREET	MICHIGAN AVENUE WIDENING	n/a	COMMERCE WAY	MAIN ST.	WIDENING	2	4			X				X				
San Bernardino	Local Highway	ONTARIO	SBD031315	SBD031315	0		0				MISSION BOULEVARD GROVE TO HAVEN WIDEN FROM 4 LANES TO 6 LANES ,LANDSCAPED MEDIAN AND STORM DRAIN(3.3 MI) [T21-#60] SEG.1 ARCHIBALD TO HAVEN AND SEG.2- GROVE TO ARCHIBALD	MISSION BLVD	n/a	GROVE AVE	ARCHIBALD AVE	WIDENING, LANDSCAPE MEDIAN	4	6			X				X				
San Bernardino	Local Highway	ONTARIO	SBD031315	SBD031315	0		0				MISSION BOULEVARD GROVE TO HAVEN WIDEN FROM 4 LANES TO 6 LANES ,LANDSCAPED MEDIAN AND STORM DRAIN(3.3 MI) [T21-#60] SEG.1 ARCHIBALD TO HAVEN AND SEG.2- GROVE TO ARCHIBALD	MISSION BOULEVARD	n/a	ARCHIBALD AVE	HAVEN	WIDEN, LANDSCAPE MEDIAN	4	6			X				X				
San Bernardino	Local Highway	APPLE VALLEY	200049	200049	0		0				MOJAVE RIVER BRIDGE CROSSING FROM TERMINUS OF YUCCA LOMA RD TO TERMINUS OF GREEN TREE BLVD - PRE. ENVIRONMENTAL REVIEW FOR CONSTRUCTION OF NEW 4 LANE BRIDGE-INCLUDES A BRIDGE OVER THE BNSF RR TO HESPERIA ROAD (Project 97147 Environmental Doc is being included in this project. The projects connect and environ. doc is requiring that the whole project be included on both SBD97147 and 200049)	MOJAVE RIVER BRIDGE CROSSING	n/a	TERMINUS OF YUCCA LOMA RD	TERMINUS OF GREEN TREE BLVD	NEW 4 LANE BRIDGE-INCLUDES A BRIDGE OVER THE BNSF RR TO HESPERIA ROAD	n/a	4		$796 of STPL added to project in 06 RTIP Amend 12, October 2007. Funds were shifted from Perris Blvd widening project in RIV011205. Past CMAQ and STPL obligations both covered in HP21STPL-0027(012). CMAQ obligation - 5/14/01 with STPL obligation 9/14/06.	X			X					
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200857	200857	0	0	0				MONTE VISTA AVE. FROM PHILLIPS BLVD. TO MISSION BLVD (0.5 MILES)-WIDENING FROM 2-4 LANES	MONTE VISTA AVE.	0.5 MILES	PHILLIPS BLVD.	MISSION BLVD.	WIDENING	2	4							X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	SBD41317	SBD41317	0		0				MT. VIEW AVE, BRIDGE AT MISSION CREEK CHANNEL WIDEN ROADWAY & SHOULDER WORK AND EXISTING BRIDGE AT MT. VIEW -1 LN. NO. & SO. TO 2 LNS N/S & LFT_TURNS TO MAKE A TOTAL OF 4 LANES (2 IN EACH DIRECTION)	MT. VIEW	.03 MILES	MISSION CREEK	MT. VIEW	WIDEN FROM 2-4 LANES	2	4							X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4DM0701	2011160	0	0	0				MT. VIEW AVE. BRIDGE OVER SANTA ANA RIVER. CONSTRUCT NEW 4 LANE BRIDGE. MT. VIEW CURRENTLY TERMINATES AT SOUTH EDGE OF SANTA ANA RIVER. PROJECT WOULD EXTEND BY MEANS OF BRIDGE ACROSS RIVER.	MT. VIEW AVE. BRIDGE	n/a	OVER SANTA ANA RIVER	n/a	CONSTRUCT NEW 4 LANE BRIDGE. MT. VIEW CURRENTLY TERMINATES AT SOUTH EDGE OF SANTA ANA RIVER. PROJECT WOULD EXTEND BY MEANS OF BRIDGE ACROSS RIVER.	n/a	4						X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	SBD41316	SBD41316	0	0	0				MT. VIEW AVE. RAILWAY GRADE CROSSING, 1500 FT. NORTH OF I-10 WIDEN RAILWAY GRADE CROSSING FROM 1 LANE NORTH & SOUTH TO 2 LANES NORTH & SOUTH & UPGRADE GATES (0.75 MILES)	MT VIEW RR CROSSING	n/a	I10	1 MILE NORTH AND SOUTH	WIDEN	1	2						X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	200609	200609	0	0	0				MT.VIEW WIDENING/EXTENSION PROJECT- WIDEN S/B FROM 2-4LNS- FROM COULSTON TO RIVERVIEW (SOUTH OF SANTA ANA RIVER) [PROJECT IS SPLIT INTO 2 SEPARATE PROJECTS AS OF THE 2011 ENTRY]	MT. VIEW	.35 MILES	RIVERVIEW	CENTRAL	CONSTRUCT NEW 4 LANE RD/BRIDGE	n/a	4						X				
San Bernardino	Local Highway	VICTORVILLE	SBD88140	SBD88140	0	0	0				NATIONAL TRAILS ROAD BETWEEN INTERSTATE 15 & AIRBASE RD. WIDEN FROM 2 LANES TO 4 LANES	NATIONAL TRAILS	n/a	I-15	AIRBASE RD.	WIDEN	2	4			X		X						
San Bernardino	Local Highway	VICTORVILLE	4AL04	201179	0	0	0				NATIONAL TRIALS HIGHWAY BETWEEN INTERSTATE 15 & AIR EXPRESSWAY WIDEN FROM 2-4 LANES (1.9 MILES)	NATIONAL TRIALS HIGHWAY	1.9 MILES	320 FT. NORTH OF I-15	670 FT. NORTH OF NATIONAL TRIALS HIGHWAYS AND AIR EXPRESSWAY INTERSECTION	WIDEN	2	4						X					
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	20040209	20040209	0		0				NATL TRAILS HIWAY FROM BRYMAN RD S/O MORNING GLORY ST. TO BRYMAN TO N O MARIGOLD- WIDEN EXISTG 2 LN RD FOR PASSING LNS - 1 IN EA DIRECT., INCL TRANSITIONS Y (CO W/#200106)	NATIONAL TRAILS HIWAY	n/a	BRYMAN RD S/O MORNING GLORY	BRYMAN RD. N/O MARIGOLD	WIDEN 2-4 LANES	2	4			X			X					
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	SBD031426	SBD031426	0		0				NEEDLES HIGHWAY FROM 'N' STREET TO NEVADA STATE LINE-REALIGN, REHABILITATE, WIDEN SHOULDERS, TURN LANES, PASSING LANES, AND ACCELERATION LANES (1 LANE IN EACH DIR.) RELOCATE UTIL. (CURRENTLY PROGRAMMED FOR PSE ONLY)	NEEDLES HIGHWAY	4000 FT	N STREET	NEVADA STATE LINE	WIDEN AND REHAB, WIDEN SHOULDERS, TURN LANES AND PASSTING LANES AND ACCEL LANES	2	2					X						
San Bernardino	Local Highway	VICTORVILLE	SBD031412	SBD031412	0	0	0				NISQUALLI RD FROM BALSAM RD TO HESPERIA RD - WIDEN FROM 2 LANES TO 4 LANES, DRAINAGE IMPROVEMENTS, AND VERTICAL REALIGNMENT	NISQUALLI RD.	n/a	BALSAM RD.	HESPERIA RD.	WIDEN	2	4			X		X						
San Bernardino	Local Highway	HIGHLAND	200213	200213	0		0				ON 3RD ST. FROM PALM AVE. TO 5TH ST. WIDEN 3RD ST. E/O PALM AVE. FROM 2 TO 3 LANES AND EXTEND 3RD ST. EASTERLY TO CONNECT 5TH ST.	3RD ST	0.3 MILES	PALM ST	5TH ST.	WIDEN	2	3			X			X					
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	200414	200414	0	0	0				ON DUNCAN ROAD FROM OASIS EAST TO BALDY MESA PAVE DIRT ROADS 1 LANE IN EACH DIRECTION INCLUDING STOP SIGNS AT RR CROSSING	DUNCAN ROAD	n/a	OASIS RD.	BALDY MESA	PAVE DIRT ROADS	n/a	2					X						
San Bernardino	Local Highway	REDLANDS	4GL04	201113	0	0	0				ORANGE STREET FROM LUGONIA TO SAN BERNARDINO AVE. -WIDEN THE EAST SIDE OF THE STREET TO REMOVE A RESTRICTION IN THE ROADWAY TRAVEL AREA. PROJECT INCLUDES ROAD PAVING, CURB AND GUTTER, SIDEWALK, STREET LIGHTING, STRIPING AND MARKING, AND LANDSCAPE IMPROVEMENTS. THE PROJECT WILL IMPROVE PEDESTRIAN AND VEHICULAR SAFE TRAVEL AND CIRCULATION.	ORANGE STREET	n/a	LUGONIA	SAN BERNARDINO AVE.	n/a	n/a	n/a								X				

County	System	Lead Agency	RTP ID	FTIP ID	Begin PM	End PM	Route Number	Route Name	From	To	Description	Roadway Segment: Route Name	Length	From	To	Description	Existing Lanes	Proposed Lanes	Transit Segment: Route	Additional Details	RTP Baseline	Network Year (Project Completion By): 2008	2012	2014	2018	2020	2023	2030	2035
San Bernardino	Local Highway	REDLANDS	200420	200420	0	0	0				ORANGE STREET WIDENING - FROM NORTH CITY LIMITS TO RIVERVIEW DRIVE - WIDEN STREET FROM 2-4 LANES	ORANGE STREET	n/a	NORTH CITY LIMITS	RIVERVIEW DRIVE	WIDEN	2	4						X				
San Bernardino	Local Highway	COLTON	4A07200	201159	0	0	0				PEPPER AVE. (segment south of I-10) FROM SLOVER TO AGUA MANSA. NEW 2 LANE CONNECTION. TRAFFIC SIGNAL AT PEPPER AND AGUA MANSA.	PEPPER AVE.	0.80 Miles	SLOVER AVE.	AGUA MANSA RD.	PAVE NEW ROAD EXTENSION.	n/a	2						X				
San Bernardino	Local Highway	RIALTO	2002170	2002170	0		0				PEPPER AVE: FOOTHILL BLVD TO SR 210 -- WIDEN EXISTING 2 LANES TO 4 LANES (2 EACH DIR)	PEPPER AVE	n/a	FOOTHILL BLVD	SR210	WIDEN	2	4			X		X						
San Bernardino	Local Highway	CHINO HILLS	4A1001	20083403	0		0				PEYTON DRIVE FROM ENGLISH RD. TO EUCALYPTUS; WIDEN PEYTON FROM 4-6 LANES WITH MARKED BIKE LANES IN EACH DIRECTION (PHASE 2) OF SB041242	PEYTON DRIVE	0	ENGLISH RD.	EUCALYPTUS AVE.	WIDEN	4	6					X						
San Bernardino	Local Highway	CHINO HILLS	4A1002	20083402	0		0				PEYTON DRIVE FROM EUCALYPTUS TO SR 142; WIDEN PEYTON TO 2-4 LANES WITH MARKED BIKE LANES IN EACH DIRECTION	PEYTON DRIVE	n/a	EUCALYPTUS	SR 142	WIDEN PEYTON TO 2-4 LANES	2	4		$796 of STPL added to project in 06 RTIP Amend 12, October 2007. Funds were shifted from Perris Blvd widening project in RIV011205. Past CMAQ and STPL obligations both covered in HP215TPL-0027(012). CMAQ obligation - 5/14/01 with STPL obligation 9/14/06.	X			X					
San Bernardino	Local Highway	HESPERIA	SBD55028	SBD55028	0	0	0				RANCHERO RD. FROM DANBURY TO ARROWHEAD LAKE RD. - WIDEN FROM 2 TO 4 LANES (3 MILES)	RANCHERO RD	n/a	DANBURY	ARROWHEAD LAKE RD	WIDEN	2	4						X				
San Bernardino	Local Highway	HESPERIA	SBD55030	SBD55030	0	0	0				RANCHERO RD. FROM I-15 TO 7TH ST. - WIDEN FROM 2 TO 4 LANES (5.50 MILES)	RANCHERO RD.	5.5 MILES	I-15	7TH STREET	WIDEN FROM 2-4 LANES	2	4			X		X						
San Bernardino	Local Highway	HESPERIA	SBD031276	SBD031276	0		0				RANCHERO ROAD 7TH AVENUE TO DANBURY. REALIGN ROAD AND WIDEN FROM 2-4 LANES AND CONSTRUCT RAILROAD UNDERCROSSING	RANCHERO ROAD	n/a	7TH AVENUE	DANBURY	CONSTRUCT RAILROAD UNDERCROSSING	2	4			X		X						
San Bernardino	Local Highway	HESPERIA	SBD41289	SBD41289	0	0	0				RANCHO LAS FLORES PARKWAY -NO LANES CURRENTLY EXIST. DEVELOPER TO CONST RUCT HIGHWY 138 TO RANCHERO RD. 2 LANES IN EACH DIRECTION.	RANCHO LAS FLORES	n/a	SR138	RANCHERO RD	CONSTRUCT NEW ROAD/NEW CONNECTION	n/a	4			X			X					
San Bernardino	Local Highway	FONTANA	4A07225	SBD031259	0	0	0				RANDALL AVENUE ALDER AVENUE TO MAPLE AVENUE. WIDEN FROM 2 TO 4 LANES	RANDALL AVENUE	n/a	ALDER AVENUE	MAPLE AVENUE	WIDEN	2	4						X				
San Bernardino	Local Highway	LOMA LINDA	SBD031296	SBD031296	0	0	0				REDLANDS BOULEVARD EAST CITY LIMITS TO WEST CITY LIMITS WIDEN FROM 4 LANES TO 6 LANES	REDLANDS BLVD	n/a	EAST CITY LIMITS	WEST CITY LIMITS	WIDEN	4	6						X				
San Bernardino	Local Highway	RIALTO	200603	200603	0		0				RIVERSIDE AVE. OVER METROLINK AND BNSF RY, 0.1 MI S OF I-10 REMOVE AND REPLACE EXISTING 5 LANE BRIDGE WITH 7 LANE BRIDGE (PA&ED ONLY) SCOPING FOR PORJECT. HIGH COST PROJECT AGREEMENT REQUIRED PRIOR TO PE AUTHORIZATION.	RIVERSIDE AVE	0.02	S/O I-10	SLOVER AVE.	RR BRIDGE MODIFICATION	5	7						X				
San Bernardino	Local Highway	CHINO	SBD031152	SBD031152	0	0	0				RIVERSIDE DRIVE AT SAN ANTONIO FLOOD CONTROL CHANNEL WIDEN BRIDGE FROM 4 LANES TO 6 LANES	RIVERSIDE AVE	n/a	AT SAN ANTONIO FLOOD CONTROL	AT SAN ANTONIO FLOOD CONTROL	WIDEN BRIDGE FROM 4-6 LANES	4	6			X		X						
San Bernardino	Local Highway	FONTANA	SBD031266	SBD031266	0		0				SIERRA AVENUE FOOTHILL BOULEVARD TO BASELINE AVENUE- WIDEN FROM 4 TO 6 LANES	SIERRA AVENUE	n/a	FOOTHILL BOULEVARD	BASELINE AVENUE	WIDEN	4	6						X				
San Bernardino	Local Highway	FONTANA	4A04126	201145	0	0	0				SIERRA AVENUE FROM VALLEY BOULEVARD TO SAN BERNARDINO AVENUE WIDEN FROM 4 TO 6 LANES	SIERRA AVENUE	n/a	VALLEY BOULEVARD	SAN BERNARDINO	WIDEN	4	6			X		X						
San Bernardino	Local Highway	FONTANA	4A04127	201146	0	0	0				SIERRA LAKES PARKWAY FROM BEECH AVENUE TO CITRUS AVENUE WIDEN FROM 2 TO 4 LANES.	SIERRA LAKES PARKWAY	n/a	BEECH AVENUE	CITRUS AVENUE	WIDEN	2	4			X			X				
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A01285	201161	0	0	0				SLOVER AVE: FROM ALDER AVE EAST TO LINDEN AVENUE WIDEN 2-4 LANES	SLOVER AVENUE	n/a	ALDER AVENUE EAST	LINDEN AVENUE	WIDEN	2	4			X		X						
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	4A01285	201150	0	0	0				SLOVER AVENUE FROM CEDAR AVE. EAST TO LARCH AVE. WIDEN FROM 2-4 LANES	SLOVER AVE.	n/a	CEDAR AVE.	EAST OF LARCH AVE.	WIDEN FROM 2-4 LANES	2	4			X		X						
San Bernardino	Local Highway	FONTANA	4A01132	201147	0	0	0				SLOVER AVENUE FROM ETIWANDA AVENUE TO 800 FEET EAST OF ETIWANDA AVENUE WIDEN FROM 2-4 LANES	SLOVER AVENUE	n/a	ETIWANDA AVENUE	800 FT. EAST OF ETIWANDA AVENUE	WIDEN	2	4			X			X				
San Bernardino	Local Highway	CHINO HILLS	SBD41241	SBD41241	0		0				SOQUEL CANYON PARKWAY EXTENSNION CONSTRUCT NEW 2 LANE_ROAD W BIKE LANES FROM EXISTING TERMINUS OF SOQUEL CANYON PARKWAY AT PIPELINE AVE. TO WOODVIEW ROAD AT MEDLARINCLUDED ARE BICYCLE LANES MARKED IN EACH DIRECTION	SOQUEL CANYON PARKWAY	.6198'	PIPELINE AVE	WOODVIEW	CONSTRUCT NEW 2 LANE RD.	n/a	2						X				
San Bernardino	Local Highway	FONTANA	4A07056	201148	0	0	0				SOUTH HIGHLAND AVENUE FROM CHERRY AVENUE TO CITRUS AVENUE WIDEN FROM 2 TO 4 LANES	SOUTH HIGHLAND AVENUE	n/a	CHERRY AVENUE	CITRUS AVENUE	WIDEN	2	4						X				
San Bernardino	Local Highway	HIGHLAND	REG0701	201186	0		0				SR 210 RAMPS AT BASE LINE-RAMP WIDENING - ADD LANES WIDEN ON AND OFF RAMPS AT SOUTHBOUND SR-210/BASE LINE I/C	SR210 RAMPS	ABOUT 0.5 MILES ALL TOTAL	SR210	BASELINE	WIDEN	2	n/a							X			
San Bernardino	Local Highway	CALTRANS	SBD94174	SBD94174	0	0	0				STATE ROUTE 62 CANYON TO SUNRISE WIDEN FROM 4 TO 5 LANES FOR CONTINUOUS LEFT TURN LANE	SR62	n/a	CANYON RD	SUNRISE RD	WIDEN FOR CONTINUOUS LEFT TURN LANE	4	5					X						
San Bernardino	Local Highway	TWENTYNINE PALMS	SBD94173	SBD94173	0	0	0				STATE ROUTE 62- LEE DRIVE TO LUPINE DRIVE WIDEN FROM 4 TO 5 LANES FOR CONTINUOUS LEFT TURN LANE	STATE ROUTE 62	n/a	LEE DRIVE	LUPINE DRIVE	WIDEN 4-5 LANES FOR CONTINUOUS LEFT TURN LANE	4	5					X						
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	SBD59021	SBD59021	0	0	0				STATE STREET FROM 16TH STREET TO FOOTHILL BLVD., EXTEND AND CONSTRUCT (4) LANES OF ROADWAY (1.5 MILES) TO CONNECT STATE STREET TO RANCHO AVENUE (NEW ROAD)4 PHASES TOTAL IN PROJECT	STATE ST.	n/a	16TH ST.	FOOTHILL BLVD.	CONSTRUCT NEW 4 LANE ROAD	n/a	4			X			X				
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	4OM0701	201184	0	0	0				STERLING AVE FROM 3RD STREET TO 5TH STREET - WIDEN FROM 2-4 LANES (0.13 MILES) FORMERLY PART OF PROJECT ID 200852	STERLING AVE	0.13 MILES	3RD STREET	5TH STREET	WIDEN	2	4							X			
San Bernardino	Local Highway	SAN BERNARDINO COUNTY	20040210	20040210	0		0				SUMMIT VALLEY ROAD - FROM SH138 TO RANCHERO ROAD-WIDEN FROM 2-4 LANES	SUMMIT VALLEY ROAD	n/a	SH 138	RANCHERO RD	WIDEN	2	4							X			
San Bernardino	Local Highway	CHINO	4A0802	201115	0	0	0				THE CHINO-CORONA ROAD IMPROVEMENTS PROJECT IS LOCATED IN THE NEWLY ANNEXED AREA OF THE CITY OF CHINO. IMPROVEMENTS INCLUDE CONSTRUCTION OF A NEW BRIDGE CROSSING OVER MILL CREEK (BOX CULVERT WITH ROAD OVER DRAINAGE) , A NATURAL DRAINAGE SYSTEM OWNED AND MAINTAINED BY UNITED STATES ARMY CORPS OF ENGINEERS ALONG CHINO-CORONA ROAD.	CHINO-CORONA ROAD	n/a	MILL CREEK	MILL CREEK	NEW BRIDGE	n/a	n/a			X			X				
San Bernardino	Local Highway	HIGHLAND	4A07142	201182	0	0	0				TIPPECANOE AVENUE FROM 3RD STREET TO 5TH STREET - WIDEN FROM 2-4 LANES (0.3 MILES) FORMERLY PART OF PROJECT ID 200852	TIPPECANOE	0.3 MILES	3RD STREET	5TH STREET	WIDEN	2	4							X			
San Bernardino	Local Highway	SAN BERNARDINO, CITY OF	200610	200610	0	0	0				TIPPECANOE WIDENING PROJECT - BETWEEN MILL AND SANTA ANA RIVER BRIDGE ST. (1.4 MI)-WIDEN FROM 4-6 LANES INCLUD MEDIAN LANDSCAPE	TIPPECANOE	0	MILL ST	SANTA ANA RIVER BRIDGE	WIDEN	4	6					X					
San Bernardino	Local Highway	FONTANA	4A07274	201162	0	0	0				VALLEY BOULEVARD FROM BEECH AVENUE TO CITRUS AVENUE WIDEN FROM 4-6 LANES	VALLEY BOULEVARD	n/a	BEECH AVENUE	CITRUS AVENUE	WIDEN	4	6							X			
San Bernardino	Local Highway	FONTANA	4A07273	201149	0	0	0				VALLEY BOULEVARD FROM CHERRY AVENUE TO BEECH AVENUE WIDEN FROM 4-6 LANES	VALLEY BOULEVARD	n/a	CHERRY AVENUE	BEECH AVENUE	WIDEN	4	6							X			
San Bernardino	Local Highway	FONTANA	4A1007	201163	0	0	0				VALLEY BOULEVARD FROM CITRUS AVENUE TO SIERRA AVENUE WIDEN FROM 4-6 LANES	VALLEY BOULEVARD	n/a	CITRUS AVENUE	SIERRA AVENUE	WIDEN	4	6							X			
San Bernardino	Local Highway	FONTANA	4A07273	201165	0	0	0				VALLEY BOULEVARD FROM HEMLOCK AVENUE TO BEECH AVENUE WIDEN FROM 4-6 LANES	VALLEY BOULEVARD	n/a	HEMLOCK AVENUE	BEECH AVENUE	WIDEN	4	6						X				
San Bernardino	Local Highway	FONTANA	4A07140	201164	0	0	0				VALLEY BOULEVARD FROM SIERRA AVENUE TO ALDER AVENUE WIDEN FROM 4-6 LANES	VALLEY BOULEVARD	n/a	SIERRA AVENUE	ALDER AVENUE	WIDEN	4	6							X			
San Bernardino	Local Highway	REDLANDS	200035	200035	0	0	0				WABASH AV FROM 5TH ST TO I-10 - CONSTRUCT NEW 2 LANE STREET TO I-10 TO MATCH ON AND OFF RAMPS-CONSTRUCT MISSING LINK (2 LANE IN EACH DIRECTION) 1 MILE	WABASH AVE	n/a	5TH AVE	I-10 FREEWAY	CONSTRUCT 2 LANE MISSING LINK	n/a	2			X			X				

CITY of CYPRESS

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February 28, 2012

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

Subject: OCCOG Letter of February 14, 2012

Dear Mr. Ikhrata:

On behalf of the Cypress City Council, I am contacting you to urge adoption of the comments made by OCCOG in their February 14, 2012 letter (attached) regarding the current RTP/SCS process and its corresponding/associated PEIR.

The work done by OCCOG was exhaustive, well considered and clearly demonstrates the commitment made by the member agencies to meaningfully participate in the preparation and review of a supportable and balanced RTP/SCS.

We are all aware of the scope and long term importance of these documents. The incorporation of the attached comments will contribute greatly to the viability of SCAG's efforts in this area and will result in an enhanced final product.

Thank you for coordinating this effort. The City of Cypress looks forward to a final document that incorporates these comments.

Sincerely,

Doug Bailey
Mayor

Attachment

Cc: City Council
City Manager
Director of Community Development

Doug Bailey, Mayor
Prakash Narain, M.D., Mayor Pro Tem **Phil Luebben**, Council Member
Leroy Mills, Council Member **Todd W. Seymore**, Council Member

OCCOG

Orange County
Council of Governments
Member Agencies

Aliso Viejo
Anaheim
Brea
Buena Park
Costa Mesa
Cypress
Dana Point
Fountain Valley
Fullerton
Garden Grove
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 Ikhrata
Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th 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 <u>are available as tools for implementing agencies and local lead agencies to use as they deem applicable</u>. The implementing agencies and local lead agencies <u>are</u> 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. <u>"Can and Should"</u>

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.

<u>"Can and Should" Recommendations:</u> Change language in all mitigation measures identifying entities other than SCAG to read "~~can and~~ should <u>consider where applicable and feasible</u>." 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. <u>CEQA Streamlining:</u>

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.

<u>SCAG Authority Recommendation:</u> 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. <u>SCAG Mitigation Measures</u>

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.

<u>SCAG Mitigation Measures Request:</u> 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. <u>Ensuring Outcomes</u>

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)

Air Quality/AQMD	CDFG	Federal & state law	Federal law	Resource agencies
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	**NPDES**	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		**Flood control**	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		**Local Agencies**	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
State law				
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	*All chapter headings should include the Chapter number on each page for ease of reference.*
2	Clarification	1, left column	"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, ~~both~~ 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 ensures the region receives its fair share of funding, 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	*Is additional $0.15 gas tax the sum total of both state and federal taxes or $0.15 each?*
5	Clarification	40, left column	"Strategic investments, put forth by the private sector, that would remove barriers associated with telecommuting are expected…"
6	Correction	page 42- Table 2.2	241 toll road completion year is 2030
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 during peak periods."
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, COMMENT & RECOMMENDATION
			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.
10	Clarification	78, right column	"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>
11	Clarification	80, left column	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. *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?* *Recommended text change:* "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~~ <u>attract more of the regional</u> population growth in certain areas of the region. <u>This means that although</u> ~~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." "~~In addition to induced population growth,~~ transportation projects in the RTP also have the potential to divide established communities, primarily through acquisition of rights-of-way."

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		82, right column	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. *Recommended text change:* "Cumulative impacts from the projected growth ~~induced by the RTP~~ include increased impervious surfaces;..."
12	Clarification	Chapter 3	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. *Please explain what the implications are if these new revenue sources and innovative financing strategies do not become available?*
13	Clarification	page 95-Table 3.3	~~"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."~~ Suggested language is from page 31 of Growth Forecast Appendix: "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."

#	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 is projecting growth on only a small fraction of the ~~has little~~ raw land available in the region ~~left to accommodate additional growth~~."
15	Clarification	105, right column	"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 ~~has little~~ raw land available in the region ~~left to accommodate additional growth~~."
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. *Please add clarifying text that these subregional SCSs, including the OC SCS, represent the Sustainable Communities Strategies applicable to those subregions.*
17	Clarification	110, right column	"Municipal water and sewer systems, for example, ensure clean water. At the same time, ~~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 hydromodifcation downstream in sections which are not yet engineered and hardened. Many strategies…"
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, COMMENT & RECOMMENDATION
			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. *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.*
19	Clarification	113, 122	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. 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. *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.*
20 17	Add to glossary	127, right column	"Gentrification"
21	Clarification	128, left column	"Thus, this adjustment allowed the land use pattern to conform more closely to local ~~expectations~~ <u>general plans</u>, while reducing the amount of vehicle miles traveled." *Whose/What are "local expectations?"*

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
22	Clarification	149, right column	*Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.* "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which would help ~~can and should undertake in order~~ to successfully implement the SCS."
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 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. *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)?*
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), the CEHD, the EEC, and the SCAG Regional Council are publicly noticed and ..."
26	Clarification	201	*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.*
27	Clarification	202, 203-Table 7.1	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. *Please confirm that these are consistent with the OC SCS.*

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
28	Clarification	207	Strategic Finance *Please explain what will happen if reasonably foreseeable revenue sources of approximately $200 million do not become available?*
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). *Please incorporate revised Orange County numbers (i.e. OCP-2010 Modified) into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.*

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." *Is there any formal role for the performance measures?* ARB will evaluate for SB 375 compliance not based on these measures but based on ARB process. *Please include language clarifying that this is a requirement to demonstrate compliance with federal requirements and not for the obligations under SB 375.*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	Clarification	1, end of first paragraph	Add statement: "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."
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." *Does this bring any formal obligation to meet goals? Goals are general, flexible, and aspirational rather than specific, as on p.1.*
4	Clarification	13, Table 8	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. 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 *Are the auto and bus accessibility variables included in the regression models for 30-mile rings?* *In "Number of trips" model – is number of cars, included as an independent variable, the actual or predicted value?* *The same question applies to other models.*
6	Clarification	23, Table 10	NHTS Model Documentation Report *Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample?*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
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. *Please describe the scenarios tested.*

TRANSPORTATION FINANCE APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	General	*What are the implications if revenues other than core revenues do not become available?* *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?*

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. *Please be consistent with naming protocol for alternatives between two/all documents.*

#	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, except in Gateway and Orange County COG subregions per their SCS delegation agreements. Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family ~~hosuing~~ 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 housing or employment growth, while some urban areas with very good access to regional transit may experience significant increases in housing or employment 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 population, households and jobs;..." "Detailed forecast: the detailed distribution of population, households, and jobs 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, except in Gateway and Orange County COG subregions per their SCS delegation agreements." Add statement to table notes: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
8	Revise language to clarify	74, Table D2	Alternatives A & B: Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
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." *Please clarify if TAZ is Tier 1, Tier 2, or both.*
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~~ unchanged 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)." *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?*
12	Revise language to clarify	80	Alternative A Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
13	Revise language to clarify	81	Alternative B 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. *Is Alternative B the SCS land use plan?* *Add statement:* Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
14	Clarification	115, left column	Transit Zoning Code Santa Ana 2011 *Is this a duplicate of the 2010 Santa Ana project?*

PEIR

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	Revise language to clarify	ES-2	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: 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. 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.
2	Clarification	ES-3, 1-4, Chapter 4	Alternatives' Naming: No Project Alternative, Modified 2008 RTP Alternative, Envision 2 Alternative; Alternatives 1, 2, 3 Names of Alternatives differ than those listed in the SCS Background Documentation appendix on pages 71-74 and 80-83. *Please be consistent with naming protocol for alternatives between all documents.*

#	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	*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)*
13	Language correction	1-6, paragraph 3	Language correction: "The ~~latter~~ **former** finding…"
14	Language correction	2-5	Sustainability section should be separated. Language correction: **Sustainability**. The 2012-2035 RTP/SCS is subject to specific requirements for environmental performance. **New paragraph:** "Beyond simply meeting these requirements, a …"
15	Language correction	2-5, Table 2-2	"Align the plan investments and policies ~~with~~ **while** improving…"
16	Please define	2-14	Define "scrip"

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
17	Narrative	2-21	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". ~~Goods movement is also a major source of GHG emissions that contribute to global climate change.~~
18	Clarification	2-27 paragraph 4	Not in SCAG's authority, nor funding available. Delete sentence: ~~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.~~
19	Clarification	2-27 paragraph 5	"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." *Please confirm that there are no changes to the local land use inputs provided by Orange County.*

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	2-29	"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." *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?* *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.*
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	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. *Please remove references to the Envision 2 (or any other name of this alternative) as being environmentally superior.* ~~ENVIRONMENTALLY SUPERIOR~~ <u>ENVISION 2</u> ALTERNATIVE
23	Revise language to clarify	4-40	"Of the three alternatives, the Envision 2 Alternative would be considered <u>by State CEQA guidelines as</u> the environmentally superior alternative because it does not allow further use of land for single-family development..."

City of Diamond Bar

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Ling-Ling Chang
Mayor

Jack Tanaka
Mayor Pro Tem

Ron Everett
Council Member

Carol Herrera
Council Member

Steve Tye
Council Member

February 14, 2012

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

Re: Draft Program Environmental Impact Report for the 2012-2035 Regional Transportation Plan and Sustainable Communities Plan (SCH# 2011051018)

Dear Ms. Lin:

The City of Diamond Bar recognizes the importance of the Southern California Association of Governments ("SCAG") Draft 2012 Regional Transportation Plan ("2012 RTP") and Draft Program Environmental Impact Report ("PEIR"). The City is supportive of strategies that improve the regional transportation system within the SCAG region.

While the overall goal to reduce both the congestion impacts and environmental impacts is admirable, we continue to have significant concerns regarding the component of the 2012 RTP to designate only the Pomona (SR 60) Freeway as an East-West Freight Corridor ("Corridor") and the continued focus on the placement of 4 lanes of truck traffic within the San Jose Creek Wash ("SJC") which is located immediately adjacent to homes and business of many cities, including Diamond Bar. We have provided numerous comments to SCAG over the many months of discussion regarding the 2012 RTP public discussion outlining our concerns. Copies of our three most recent letters (dated September 29, 2011, October 28, 2011 and November 14, 2011) are attached describing our concerns in more detail. In addition, numerous cities along the SR-60 corridor have protested the proposal with their adoption of resolutions in opposition to the plan.

We believe it is pre-mature to identify the State Route 60 and the San Jose Creek Wash alignments as a viable East-West Freight Corridor Project in the 2012 RTP. We have the following specific concerns:

- No studies have been conducted regarding the localized air, noise, vibration, or visual impacts of an elevated facility along the Corridor.

Such studies may conclude that the impacts are significant, resulting in objections from surrounding communities and the need for costly mitigation (including ROW acquisition).

- While the SR-60 and the SJC are identified as "preferred" alignments, further studies may find it more practical/beneficial to select another alignment. There are pros/cons to each alignment, but selecting a final alignment will need to consider the results of the detailed studies for SR-60 and SJC, which have not yet been performed. Many of the possible routes were rejected in the planning process due to excessive ROW impacts. Further studies may find that the ROW impacts along SR-60 and the SJC (due to air, noise, vibration and/or visual) are as great or greater than other corridors.

- The desired electric technology does not have any large-scale application to verify that it is feasible for this vision. Even if it did exist, it is not clear what would motivate truck owners/operators to convert? SCAG's East-West Freight Corridor planning documents acknowledge that most of the truck traffic in this corridor is not going to/from the ports, so it is hard to believe that all of the independent truck owners would elect to convert. Furthermore, does the RTP specifically allow use of the truck-only freight corridor, from day one and thereafter, by only new technology, zero emission, "clean" trucks?

Given the above facts regarding the significant unknowns and that further studies are needed, it is our assertion that SCAG has under-stated the environmental impacts of the RTP by:

1. Inappropriately including the East-West Freight Corridor in the financially-constrained plan. Given the huge uncertainties in its actual cost, **it is not reasonable to assume the Corridor can be afforded within the constrained monies**. The RTP guidelines were changed several years ago to prevent agencies from including projects that could not reasonably be afforded in the planning horizon. The "constrained" plan should only include projects that, in aggregate, can be demonstrated as affordable within the available revenues. The costs of the Corridor cannot be estimated with any credibility, given the lack of technical studies and corresponding

lack of knowledge regarding right-of-way or mitigation costs. How the proposed Corridor connects to the SR 57/60 interchange is also undefined, which has potentially enormous cost. Much of the segment east of SR-57, within the SR-60 corridor, is severely constrained. It is not clear how the truck lane would be accommodated in this stretch; therefore, no reasonable estimate of cost can be derived. *The following citations support the above claim and are from the 2010 RTP Guidelines, California Transportation Commission*:

- Page 98- "Fiscal constraint is the demonstration of sufficient funding (Federal, State, local and private) to operate and maintain transportation facilities and services and to implement planned and programmed transportation system improvements."

- Page 100 - "If FHWA and FTA find an RTP or FTIP to be fiscally constrained and the planned/programmed projects are included based on outdated or invalid cost estimates, then FHWA/FTA will not make funding or environmental approval actions for the listed project(s)....."

- Page 101 – ".....costs of future transportation projects must use "year of expenditure dollars" rather than "constant dollars" in cost and revenue estimates to better reflect the time-based value of money."

2. The PEIR air quality analysis assumes that all trucks using the proposed east/west facility will be zero-emissions. **This is too speculative, given the discussion above, to take as fact in evaluating the air quality impacts of the RTP. Consequently, the emissions are understated in the PEIR**. The California Attorney General's office and other parties have filed suit challenging the legitimacy of the draft SANDAG RTP for the same reasons – namely, overly optimistic assumptions regarding the air quality analysis.

Attempts to focus truck lanes on the SR-60 and the San Jose Creek are not new. This type of proposal has been previously pursued. The City of Diamond Bar and other cities and communities along the proposed

Corridor are concerned about being put in another adversarial position. Based on past actions our constituents have been strongly opposed to proposals that require the SR-60 and the SJC "shoulder the burden" of east-west truck movements and have been willing to "go the distance" in our efforts against such proposal.

We respectfully request the 2012 RTP and PEIR to consider all possible routes to serve the ever-increasing demands of the east-west goods movement between I-710 and I-15. It is unreasonable to designate the SR-60 and the San Jose Creek as the singular east-west route.

Thank you in advance for your attention to our concerns. Should you have any questions regarding this letter, please contact Mr. David G. Liu, Director of Public Works/City Engineer at (909) 839-7041.

Sincerely,

for James DeStefano
City Manager

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

Attachments: Letters dated September 29, 2011, October 28, 2011, November 14, 2011

City of Diamond Bar

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www.diamondbarca.gov

September 29, 2011

RE: Opposition To SCAG's Proposed East West Freight/Truck Lane Corridor

Dear SCAG Regional Council Members:

The Southern California Association of Governments (SCAG) is tasked with many conflicting mandates, often requiring very extensive and painstaking processes that often put member agencies and individual regional transportation proposals at odds. The City of Diamond Bar applauds the efforts of SCAG to meet its clean air mandates, but unfortunately we cannot sit idle while the Proposed East West Freight/Truck Lane Corridor is steamrolled into the 2012 Draft Regional Transportation Plan (RTP), with implications for not only Diamond Bar residents, but the millions of Southern California residents living along the proposed corridor.

The City of Diamond Bar has previously mentioned several concerns with regard to the SCAG proposed East-West Freight Corridor, which will run adjacent to the Union Pacific Railroad (UPRR) from I-710 to I-605, transitioning to a 50 foot elevated four lane structure along San Jose Creek to the SR-57/60 Interchange, and merging into the SR-60 with a terminus at I-15. The proposal is missing detailed engineering for the specific location of the proposed corridor and connectors, and will certainly impact the available right of way for previously approved Metro and SCAG/SGVCOG sponsored transportation projects that include the 57/60 Confluence Project, missing connectors between SR-60 and SR-57, SR-57 HOV lanes, I-605/SR-60 Mixed Flow and HOV direct connectors, and the Gold Line light rail extension from East Los Angeles to South El Monte near I-605. These are high priority projects that will be realized in the coming decades and are essential to all residents and businesses in Southern California that utilize public infrastructure on a daily basis.

I sincerely hope that the SCAG Transportation Committee and Regional Council exclude the proposal from the 2012 Draft Regional Transportation Plan. To interfere with even one approved project for a proposed freight corridor that will cost unforeseen billions of dollars at a time of economic uncertainty and without comprehensive review from agencies such as LA County Public Works and the Army Corps of Engineers is irresponsible.

Thank you for your attention to our concerns. I have also attached copies of Resolutions in opposition to the proposal adopted by the directly impacted Cities of Diamond Bar, South El Monte and Walnut. If you have any questions, please contact City Manager James DeStefano at (909) 839-7010 or email at jdestefano@diamondbarca.gov.

Sincerely,

Steve Tye, Mayor

CC: Cities of Azusa, Brea, Chino, Chino Hills, Claremont, Commerce, Covina, Duarte, El Monte, La Puente, Monrovia, Montebello, Monterey Park, Ontario, Pico Rivera, Pomona, Rosemead, San Dimas, San Gabriel, South El Monte, Walnut, West Covina, Whittier

Steve Tye
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October 28, 2011

RE: Opposition To SCAG's Proposed East West Freight/Truck Lane Corridor

Dear SCAG Regional Council Members:

On behalf of the City of Diamond Bar and the cities along the SR-60 Adjacent Freight Corridor, I urge the Southern California Association of Governments (SCAG) Regional Council to amend the Draft 2012 Regional Transportation Plan (RTP) to include all East-West corridors from I-710 to I-15 as a comprehensive Zero Emission Freight Corridor Network.

The proposed SR-60 Adjacent Freight Corridor would be an enormous undertaking, spanning from I-710 near the Hobart Rail Lines to the SR-60/I-15 Interchange. Although a portion of the corridor would be on the SR-60 freeway east of the SR-57/60 Interchange to I-15, the largest section would be on a 50 foot four lane elevated highway along the San Jose Creek and UPRR that bisects residential communities within a dozen cities and unincorporated areas. Additionally, the proposed corridor could potentially conflict with vital transportation projects that include the SR-57/60 Confluence Project, missing connectors between SR-60 and SR-57, SR-57 HOV lanes, I-605/SR-60 Mixed Flow and HOV direct connectors, and the Gold Line light rail extension from East Los Angeles to South El Monte near I-605.

Many cities along the proposed corridor have expressed concerns with the RTP process and have been unable to meet with SCAG prior to the release of the Draft RTP. As officials representing the public good for the entire region, it is imperative that the RTP process remain open and transparent. By incorporating the expanded East-West Freight Corridor Network into the Draft RTP, many of the concerns expressed by corridor cities could be ameliorated.

Lastly, with comment from Los Angeles County Public Works and the U.S. Army Corps of Engineers still pending, it would be ill advised for the Regional Council to move forward with releasing the Draft RTP if these agencies that own and operate a significant portion of the corridor were to object to the proposal. Amending the Draft RTP to incorporate all East-West freight corridors into an expanded Freight Corridor Network could prevent future confusion or EIR challenge if the proposal were to be found infeasible.

Thank you in advance for your consideration. If you have any questions, please contact City Manager James DeStefano at (909) 839-7010 or email at jdestefano@diamondbarca.gov.

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November 14, 2011

RE: Opposition To SCAG's Proposed East West Freight/Truck Lane Corridor

Dear SGVCOG Governing Board:

The San Gabriel Valley Council of Governments (SGVCOG) has long partnered with regional planning entities such as the Southern California Association of Governments (SCAG) to spearhead regional transportation projects. The City of Diamond Bar, like many cities that are part of the SGVCOG, have benefitted from this partnership.

However, on behalf of the City of Diamond Bar and many cities in the region, I want to bring to your attention several concerns regarding the SCAG Draft 2012 Regional Transportation Plan (RTP). Specifically, the RTP includes a proposed East-West Freight Corridor that would span from I-710 to I-15. While a portion of the corridor would be on the SR-60 freeway east of the SR-57/60 Interchange to I-15, the largest section would be on a 50-foot four lane elevated highway adjacent to the freeway along the San Jose Creek and UPRR that bisects residential communities within a dozen cities and unincorporated areas.

SCAG's presentation at the November 17 SGVCOG meeting will likely state the proposed East-West Freight Corridor will not impact SGVCOG priority transportation projects that include the SR-57/60 Interchange, missing connectors between SR-60 and SR-57, SR 57 HOV lanes, I-605/SR-60 Mixed Flow and HOV direct connectors, and the Gold Line light rail extension from East Los Angeles to South El Monte near I-605. However, without the actual engineering and environmental analysis it is difficult to visualize how all the projects can work in such confined and limited rights of way.

The City of Diamond Bar has proposed to SCAG that a comprehensive Freight Corridor Network consisting of all corridors from I-710 to I-15 should be considered. The City's proposal is consistent with the SGVCOG's official current position. I ask that before you take any action on the SCAG Draft 2012 RTP, that the Governing Board and all Committees and TAC's take adequate time to review the SCAG materials and postpone action until a later date when SGVCOG can thoroughly discuss the impacts to SGVCOG transportation priorities.

Lastly, the City of Diamond Bar, along with the cities of Chino Hills, Commerce, Montebello, Pico Rivera, South El Monte, Walnut, and West Covina have adopted resolutions in opposition to the SCAG SR-60/San Jose Creek proposal. When also considering the attached written response from Los Angeles County Public Works regarding the San Jose Creek East-West Freight Corridor Feasibility Study, adequate analysis is necessary before taking action on the proposal.

I sincerely request that you take adequate time to review the SCAG information before making a departure from the SGVCOG's current position and supporting a regional proposal that would have a disproportionate impact on SGVCOG cities.

Thank you in advance for your consideration. If you have any questions, please contact City Manager James DeStefano at (909) 839-7010 or email at jdestefano@diamondbarca.gov.

Sincerely,

Steve Tye

Steve Tye, Mayor

Steve Tye
Mayor

Ling-Ling Chang
Mayor Pro Tem

Ron Everett
Council Member

Carol Herrera
Council Member

Jack Tanaka
Council Member

Recycled paper

City of Diamond Bar

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www.diamondbarca.gov

November 14, 2011

RE: Opposition To SCAG's Proposed East West Freight/Truck Lane Corridor

Dear SGVCOG Transportation Committee:

The San Gabriel Valley Council of Governments (SGVCOG) has long partnered with regional planning entities such as the Southern California Association of Governments (SCAG) to spearhead regional transportation projects. The City of Diamond Bar, like many cities that are part of the SGVCOG, have benefitted from this partnership.

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Sincerely,

Steve Tye

Steve Tye, Mayor

Steve Tye
Mayor

Ling-Ling Chang
Mayor Pro Tem

Ron Everett
Council Member

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Jack Tanaka
Council Member

Recycled paper

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Management Services Division

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February 14, 2012

Jacob Lieb
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Transmitted via Email to 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.

WE RECYCLE

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 Hemet

PLANNING 445 EAST FLORIDA AVENUE · HEMET, CALIFORNIA 92543 (951) 765-2375

February 14, 2012

Mr. Hasan Ikhrata
Executive Director RTP@scag.ca.gov
SCAG
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

SUBJECT: City of Hemet Response to Draft 2012-2035 RTP/SCS

Dear Mr. Ikhrata:

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 HQTA 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

City of HIGHLAND Inc. 1987

February 28, 2012

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

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City Council

Mayor
Larry McCallon

Mayor Pro Tem
Penny Lilburn

Sam J. Racadio
Jody Scott
John P. Timmer

City Manager
Joseph A. Hughes

Subject: Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated draft Program Environmental Impact Report (DEIR) Comments

Dear Mr. Ikhrata:
This letter is to officially inform you that the City of Highland is in support of SANBAG's comments concerning the subject Draft RTP/SCS and DEIR as outlined in their February 14, 2012 letter (see attached).

In addition, the City respectfully request SCAG make additional adjustments to the City's Growth Distribution as presented by SANBAG and illustrated on the attached Table. Adjustments are highlighted in "**Bold**". No adjustments to the City's Growth Forecast is requested, only the "distribution" of Growth.

Should you have any questions please contact me at (909) 864-8732, Ext. 213, or Mr. Lawrence Mainez, City Planner at Ext. 215.

Sincerely,

John Jaquess
Community Development Director

Attachments:

A - SANBAG letter dated February 14, 2012
B - City of Highland Proposed Tier 3 Growth Distribution Adjustments

Cc: Joseph Hughes, City Manager
Lawrence Mainez, City Planner
Steve Smith, SANBAG - Chief of Planning

ATTACHMENT – A
SANBAG comment letter dated February 14, 2012

Governments SANBAG Working Together

San Bernardino Associated Governments

1170 W. 3rd Street, 2nd Floor San Bernardino, CA 92410-1715
Phone: (909) 884-8276 Fax: (909) 885-4407 Web: www.sanbag.ca.gov

TRANSPORTATION MEASURE I

- San Bernardino County Transportation Commission
- San Bernardino County Transportation Authority
- San Bernardino County Congestion Management Agency
- Service Authority for Freeway Emergencies

February 14, 2012

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

Dear Mr. Ikhrata:

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.

Cities of: Adelanto, Barstow, Big Bear Lake, Chino, Chino Hills, Colton, Fontana, Grand Terrace, Hesperia, Highland, Loma Linda, Montclair, Needles, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Twentynine Palms, Upland, Victorville, Yucaipa
Towns of: Apple Valley, Yucca Valley County of San Bernardino

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 Ranchero 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

HI120214-lm

ATTACHMENT – B
City of Highland Proposed Tier 3 Growth Distribution Adjustments

City of Highland

Proposed Tier 3 Growth Distribution
Growth Map 2008-2035 San Bernardino County

A. SANBAG (see SANBAG comment letter February 14, 2012)			B. City of Highland proposed Growth Distribution		
Tier 3 Zone	Household Growth:	Employment Growth:	Household Growth - Adj: (change in "Bold")	Employment Growth Adj.:	
53810101	10.03	815.15	**0**	815.15	
53810102	5.27	172.87	**0**	**503.87**	
53812102	2.43	27.7	2.43	27.7	
53815102	158.23	28.93	**50**	28.93	
53815201	30.85	80.43	**20.58**	80.43	
53815202	36.71	5.6	**25**	5.6	
53820101	20.5	7.15	20.5	7.15	
53820102	554.26	1617.21	**250**	**800**	
53820201	59.58	10.74	**10**	10.74	
53820202	419.5	63.75	**50**	63.75	
53821101	53.3	74.17	53.3	74.17	
53821102	43.27	24.98	**40**	24.98	
53823201	28.64	6.53	**0**	6.53	
53823301	0.13	60.55	0.13	60.55	
53828102	136.85	28.26	**40**	28.26	
53828201	83.57	441.09	**40**	441.09	
53828302	3.12	81.92	3.12	81.92	Town Center Policy Area
53828303	18.27	32.49	**50**	32.49	Town Center Policy Area
53828401	22.12	9.12	22.12	9.12	
53828402	19.65	37.37	19.65	37.37	
53828501	3.72	68.35	3.72	68.35	
53828502	16.9	10.23	16.9	10.23	
53828601	17.47	51.58	17.47	51.58	
53831101	68.36	7.35	**40**	7.35	
53831102	10.63	2.96	10.63	2.96	
53831103	0	12.41	0	12.41	
53831201	14.82	21.02	**50**	21.02	Town Center Policy Area
53831202	9.14	68.61	**20**	68.61	
53831203	0	39.27	**0**	39.27	
53831301	242.52	11.68	**80**	11.68	
53831302	234.9	100.58	**40**	100.58	

53831303	0.06	382.55	**0**	**290.37**	
53831401	78.11	86.93	**0**	86.93	
53831402 *	156.34	302.78	**700**	**1000**	Golden Triangle Policy Area
53831501	0.75	2.48	0.75	2.48	
53831601	0	8.92	0	8.92	
53838101	29.57	3.8	29.57	3.8	
53838301	0	50.17	0	50.17	
53838302	18.52	2.82	18.52	2.82	
53838401	17.42	4.21	17.42	4.21	
53838501	41.59	9.01	**10**	9.01	
53838502	7.28	3.02	7.28	3.02	
53838601	29.54	53.32	29.54	53.32	
53838602	104.64	11.19	**0**	11.19	
53842101	83.64	38.33	**50**	38.33	
53842102	0.78	177.42	**0**	177.42	
53842201	76.52	40.17	**100**	40.17	
53842301	0.15	31.85	0.15	31.85	
53842401	23.64	7.36	23.64	7.36	
53842402	258.25	39.33	**90**	39.33	
53842403	9.19	1.4	9.19	1.4	
53842404	23.98	3.66	23.98	3.66	
53842405	38.47	5.94	**0**	5.94	
53842501	38.47	43.74	**0**	43.74	
53842502	177.96	168.83	**150**	**50**	
53848203 *	155.18	92	**400**	92	Seven Oaks Policy Area
53848301 *	1860.38	648.07	**1800**	648.07	Seven Oaks Policy Area
53872203 *	180.42	141.37	**1300**	141.37	Seven Oaks Policy Area
Totals:	5735.59	6380.72	5735.59	6380.72	

SEAN JOYCE, City Manager

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City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 (949) 724-6249

February 13, 2012

Mr. Hasan Ikhrata
Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th 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. Ikhrata:

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 <u>county</u> 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 "<u>Local jurisdictions, agencies, and project sponsors should comply, as applicable, with existing federal, state, and local laws and regulations.</u>" 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 section 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, NOx, CO, PM 10, PM 2.5, and SOx 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_{2e} compared to an estimated 144 MMT of CO_{2e} under existing (2011) conditions." According to Table 3.6-3, the total estimate for Baseline (2005) CO_{2e} emissions in MMT is 132, and the estimate for Existing (2011) CO_{2e} 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-WR26imposes 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 date 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
AESTHETIC RESOURCES					
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
AIR QUALITY					
AQ1		X	X		X
AQ2		X	X		X
AQ3			X		X
AQ4					X
AQ5					X
AQ6		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
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 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/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 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
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 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
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 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
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 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
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 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
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 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
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 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
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 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
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 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
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: "<u>Mitigation measures do not supersede regulations under the jurisdiction of other regulatory agencies.</u>"**

4. **<u>Feasibility and Applicability</u>**

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.

<u>Issue: Mitigation Measures Impose Obligations Beyond Scope of SB 375</u>. 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 <u>as recommended below</u> 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 mitigation 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 mitigation 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)

Air Quality/AQMD	**CDFG**	**Federal & state law**	**Federal law**	**Resource agencies**
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	**NPDES**	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		**Flood control**	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		**Local Agencies**	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
State law				
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, COMMENT & RECOMMENDATION
1	General Comment	all	*All chapter headings should include the Chapter number on each page for ease of reference.*
2	Clarification	1, left column	"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, ~~both~~ 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 ensures the region receives its fair share of funding, 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	*Is additional $0.15 gas tax the sum total of both state and federal taxes or $0.15 each?*
5	Clarification	40, left column	"Strategic investments, put forth by the private sector, that would remove barriers associated with telecommuting are expected…"
6	Correction	page 42-Table 2.2	241 toll road completion year is 2030
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 during peak periods."
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, COMMENT & RECOMMENDATION
			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.
10	Clarification	78, right column	"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>
11	Clarification	80, left column 82, right	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. *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?* *Recommended text change:* "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~~ <u>attract more of the regional</u> population growth in certain areas of the region. <u>This means that although</u> ~~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." "~~In addition to induced population growth,~~ transportation projects in the RTP also have the potential to divide established communities, primarily through acquisition of rights-of-way."

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
		column	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. *Recommended text change:* "Cumulative impacts from the projected growth ~~induced by the RTP~~ include increased impervious surfaces;..."
12	Clarification	Chapter 3	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. *Please explain what the implications are if these new revenue sources and innovative financing strategies do not become available?*
13	Clarification	page 95-Table 3.3	~~"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."~~ Suggested language is from page 31 of Growth Forecast Appendix: "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."

#	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 is projecting growth on only a small fraction of the ~~has little~~ raw land available in the region ~~left to accommodate additional growth~~."
15	Clarification	105, right column	"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 ~~has little~~ raw land available in the region ~~left to accommodate additional growth~~."
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. *Please add clarifying text that these subregional SCSs, including the OC SCS, represent the Sustainable Communities Strategies applicable to those subregions.*
17	Clarification	110, right column	"Municipal water and sewer systems, for example, ensure clean water. At the same time, ~~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 hydromodifcation downstream in sections which are not yet engineered and hardened. Many strategies…"
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, COMMENT & RECOMMENDATION
			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. *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.*
19	Clarification	113, 122	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. 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. *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.*
20 17	Add to glossary	127, right column	"Gentrification"
21	Clarification	128, left column	"Thus, this adjustment allowed the land use pattern to conform more closely to local ~~expectations~~ <u>general plans</u>, while reducing the amount of vehicle miles traveled."

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			Whose/What are "local expectations?"
22	Clarification	149, right column	*Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.* "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which would help ~~can and should undertake in order~~ to successfully implement the SCS."
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 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. *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)?*
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), the CEHD, the EEC, and the SCAG Regional Council are publicly noticed and ..."
26	Clarification	201	*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.*
27	Clarification	202, 203- Table 7.1	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. *Please confirm that these are consistent with the*

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			OC SCS.
28	Clarification	207	Strategic Finance *Please explain what will happen if reasonably foreseeable revenue sources of approximately $200 million do not become available?*
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). *Please incorporate revised Orange County numbers (i.e. OCP-2010 Modified) into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.*

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." *Is there any formal role for the performance measures?* ARB will evaluate for SB 375 compliance not based on these measures but based on ARB process. *Please include language clarifying that this is a requirement to demonstrate compliance with federal requirements and not for the obligations under SB 375.*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
2	Clarification	1, end of first paragraph	Add statement: "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."
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." *Does this bring any formal obligation to meet goals? Goals are general, flexible, and aspirational rather than specific, as on p.1.*
4	Clarification	13, Table 8	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. 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 *Are the auto and bus accessibility variables included in the regression models for 30-mile rings?* *In "Number of trips" model – is number of cars, included as an independent variable, the actual or predicted value?* *The same question applies to other models.*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
6	Clarification	23, Table 10	NHTS Model Documentation Report *Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample?*
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. *Please describe the scenarios tested.*

TRANSPORTATION FINANCE APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	General	*What are the implications if revenues other than core revenues do not become available?* *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?*

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. *Please be consistent with naming protocol for alternatives between two/all documents.*

#	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, except in Gateway and Orange County COG subregions per their SCS delegation agreements. Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family ~~hosuing~~ 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 housing or employment growth, while some urban areas with very good access to regional transit may experience significant increases in housing or employment 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 population, households and jobs;…" "Detailed forecast: the detailed distribution of population, households, and jobs 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, except in Gateway and Orange County COG subregions per their SCS delegation agreements." Add statement to table notes: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
8	Revise language to clarify	74, Table D2	Alternatives A & B: Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
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." *Please clarify if TAZ is Tier 1, Tier 2, or both.*
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~~ unchanged 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)." *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?*
12	Revise language to clarify	80	Alternative A Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
13	Revise language to clarify	81	Alternative B 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. *Is Alternative B the SCS land use plan?* *Add statement:* Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
14	Clarification	115, left column	Transit Zoning Code Santa Ana 2011 *Is this a duplicate of the 2010 Santa Ana project?*

PEIR

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	Revise language to clarify	ES-2	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: 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. 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.

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
2	Clarification	ES-3, 1-4, Chapter 4	Alternatives' Naming: No Project Alternative, Modified 2008 RTP Alternative, Envision 2 Alternative; Alternatives 1, 2, 3 Names of Alternatives differ than those listed in the SCS Background Documentation appendix on pages 71-74 and 80-83. *Please be consistent with naming protocol for alternatives between all documents.*
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	*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)*
13	Language correction	1-6, paragraph 3	Language correction: "The ~~latter~~ **former** finding…"

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
14	Language correction	2-5	Sustainability section should be separated. Language correction: **Sustainability**. The 2012-2035 RTP/SCS is subject to specific requirements for environmental performance. **New paragraph:** "Beyond simply meeting these requirements, a …"
15	Language correction	2-5, Table 2-2	"Align the plan investments and policies ~~with~~ **while** improving…"
16	Please define	2-14	Define "scrip"
17	Narrative	2-21	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". ~~Goods movement is also a major source of GHG emissions that contribute to global climate change.~~
18	Clarification	2-27 paragraph 4	Not in SCAG's authority, nor funding available. Delete sentence: ~~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.~~
19	Clarification	2-27 paragraph 5	"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." *Please confirm that there are no changes to the local land use inputs provided by Orange County.*

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	2-29	"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." *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?* *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.*
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	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. *Please remove references to the Envision 2 (or any other name of this alternative) as being environmentally superior.* ~~ENVIRONMENTALLY SUPERIOR~~ ENVISION 2 ALTERNATIVE
23	Revise language to clarify	4-40	"Of the three alternatives, the Envision 2 Alternative would be considered by State CEQA guidelines as the environmentally superior alternative because it does not allow further use of land for single-family development…"

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. 7th Street, 12th 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 and 2012PEIR@scag.ca.gov) and via 1st 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.

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.

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

David A. Spence
Mayor

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

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City of La Habra

"A Caring Community"

ADMINISTRATIVE BUILDING

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February 13, 2012

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

SCAG
FEB 15 2012
MAIL RECEIVED

Re: SCAG Draft RTP/SCS and PEIR

Dear Mr. Ikhrata,

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

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 heaving 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.

<u>OC SCS Strategies Recommendation</u>: Please revise the text in the last paragraph on page 106 to state: "These subregional SCS documents are incorporated into the regional SCS <u>and represent the SCS for each of these subregions.</u>"

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 (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. **<u>Guidance Documents</u>**

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.

<u>Guidance Documents Recommendation:</u> Remove references that indicate a compliance with guidance documents from mitigation measures.

14. **<u>Duplicative/Existing Regulations</u>**

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 mitigation 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 mitigation 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)

Air Quality/AQMD	CDFG	Federal & state law	Federal law	Resource agencies
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	**NPDES**	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		**Flood control**	
MM-AQ14	MM-BIO/OS26		MM-HM8	
MM-AQ17	MM-BIO/OS27			
MM-AQ18	MM-BIO/OS28		**Local Agencies**	
	MM-BIO/OS14		MM-AV11	
	MM-BIO/OS7			
State law				
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	*All chapter headings should include the Chapter number on each page for ease of reference.*
2	Clarification	1, left column	"The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, ~~both~~ 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 ensures the region receives its fair share of funding, 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	*Is additional $0.15 gas tax the sum total of both state and federal taxes or $0.15 each?*
5	Clarification	40, left column	"Strategic investments, put forth by the private sector, that would remove barriers associated with telecommuting are expected…"
6	Correction	page 42-Table 2.2	241 toll road completion year is 2030
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 during peak periods."
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. *Please provide clarification to this section indicating if the air quality and greenhouse gas CEQA*

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			mitigation measures obligate regional agencies and project developers to undertake more strategies, programs and mandates beyond those included in the OC SCS.
10	Clarification	78, right column	"Greenhouse Gases On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total. 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."
11	Clarification	80, left column 82, right column	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. *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?* *Recommended text change:* "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~~ attract more of the regional population growth in certain areas of the region. This means that although ~~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." "~~In addition to induced population growth,~~ transportation projects in the RTP also have the potential to divide established communities, primarily through acquisition of rights-of-way." 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

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			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. *Recommended text change:* "Cumulative impacts from the projected growth ~~induced by the RTP~~ include increased impervious surfaces;..."
12	Clarification	Chapter 3	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. *Please explain what the implications are if these new revenue sources and innovative financing strategies do not become available?*
13	Clarification	page 95-Table 3.3	~~"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."~~ Suggested language is from page 31 of Growth Forecast Appendix: "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."
14	Clarification	105, right column	"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 ~~has little~~ raw land available in the region ~~left to accommodate additional growth~~."
15	Clarification	105, right column	"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 ~~has little~~ raw

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			land available in the region ~~left to accommodate additional growth~~."
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. *Please add clarifying text that these subregional SCSs, including the OC SCS, represent the Sustainable Communities Strategies applicable to those subregions.*
17	Clarification	110, right column	"Municipal water and sewer systems, for example, ensure clean water. At the same time, ~~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 hydromodifcation downstream in sections which are not yet engineered and hardened. Many strategies…"
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 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. *In order to confirm consistency with the OC SCS, it is requested that SCAG include appropriate tables,*

#	TOPIC/ REQUEST	PAGE REFERENCE	RTP NARRATIVE, COMMENT & RECOMMENDATION
			graphics and maps that provide the detail that confirm this consistency.
19	Clarification	113, 122	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. 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. *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.*
2017	Add to glossary	127, right column	"Gentrification"
21	Clarification	128, left column	"Thus, this adjustment allowed the land use pattern to conform more closely to local ~~expectations~~ general plans, while reducing the amount of vehicle miles traveled." *Whose/What are "local expectations?"*
22	Clarification	149, right column	*Revise language to clarify that SCAG intends policies, strategies, and measures are a menu of options.* "The following tables list specific implementation strategies that local governments, SCAG, and other stakeholders may use or consider while preparing specific projects which would help ~~can and should undertake in order~~ to successfully implement the SCS."
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
			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. *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)?*
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), the CEHD, the EEC, and the SCAG Regional Council are publicly noticed and ..."
26	Clarification	201	*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.*
27	Clarification	202, 203-Table 7.1	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. *Please confirm that these are consistent with the OC SCS.*
28	Clarification	207	Strategic Finance *Please explain what will happen if reasonably foreseeable revenue sources of approximately $200 million do not become available?*
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
			Please incorporate revised Orange County numbers (i.e. OCP-2010 Modified) into all reports, tables, exhibits, alternatives, maps, and modeling runs for final RTP.

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." *Is there any formal role for the performance measures?* ARB will evaluate for SB 375 compliance not based on these measures but based on ARB process. *Please include language clarifying that this is a requirement to demonstrate compliance with federal requirements and not for the obligations under SB 375.*
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." *Does this bring any formal obligation to meet goals? Goals are general, flexible, and aspirational rather than specific, as on p.1.*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
4	Clarification	13, Table 8	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. 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 *Are the auto and bus accessibility variables included in the regression models for 30-mile rings?* *In "Number of trips" model – is number of cars, included as an independent variable, the actual or predicted value?* *The same question applies to other models.*
6	Clarification	23, Table 10	NHTS Model Documentation Report *Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample?*
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. *Please describe the scenarios tested.*

TRANSPORTATION FINANCE APPENDIX

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
1	Clarification	General	*What are the implications if revenues other than core revenues do not become available?* *Please describe any implications to the ability of the region to meet SB 375 GHG emission reduction targets or the federally required air quality*

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
			conformity?

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. *Please be consistent with naming protocol for alternatives between two/all documents.*
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, except in Gateway and Orange County COG subregions per their SCS delegation agreements. Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multi-family ~~hosuing~~ 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 housing or employment growth, while some urban areas with very good access to regional transit may experience significant increases in housing or employment 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 population, households and jobs;..." "Detailed forecast: the detailed distribution of population, households, and jobs across the region..."

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
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, except in Gateway and Orange County COG subregions per their SCS delegation agreements." Add statement to table notes: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
8	Revise language to clarify	74, Table D2	Alternatives A & B: Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
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." *Please clarify if TAZ is Tier 1, Tier 2, or both.*
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~~ unchanged 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)." *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?*
12	Revise language to clarify	80	Alternative A Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.

#	TOPIC	PAGE REFERENCE	NARRATIVE, COMMENT & RECOMMENDATION
13	Revise language to clarify	81	Alternative B 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. *Is Alternative B the SCS land use plan?* *Add statement:* Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.
14	Clarification	115, left column	Transit Zoning Code Santa Ana 2011 *Is this a duplicate of the 2010 Santa Ana project?*

PEIR

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
1	Revise language to clarify	ES-2	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: 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. 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.
2	Clarification	ES-3, 1-4, Chapter 4	Alternatives' Naming: No Project Alternative, Modified 2008 RTP Alternative, Envision 2 Alternative; Alternatives 1, 2, 3 Names of Alternatives differ than those listed in the SCS Background Documentation appendix on pages 71-74 and 80-83. *Please be consistent with naming protocol for alternatives between all documents.*
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	*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)*
13	Language correction	1-6, paragraph 3	Language correction: "The ~~latter~~ **former** finding…"
14	Language correction	2-5	Sustainability section should be separated. Language correction: **Sustainability**. The 2012-2035 RTP/SCS is subject to specific requirements for environmental performance. **New paragraph:** "Beyond simply meeting these requirements, a …"
15	Language correction	2-5, Table 2-2	"Align the plan investments and policies ~~with~~ **while** improving…"
16	Please define	2-14	Define "scrip"

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
17	Narrative	2-21	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". ~~Goods movement is also a major source of GHG emissions that contribute to global climate change.~~
18	Clarification	2-27 paragraph 4	Not in SCAG's authority, nor funding available. Delete sentence: ~~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.~~
19	Clarification	2-27 paragraph 5	"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." *Please confirm that there are no changes to the local land use inputs provided by Orange County.*

#	TOPIC	PAGE REFERENCE	PEIR NARRATIVE, COMMENT & RECOMMENDATION
20	Clarification	2-29	"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." *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?* *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.*
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	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. *Please remove references to the Envision 2 (or any other name of this alternative) as being environmentally superior.* ~~ENVIRONMENTALLY SUPERIOR~~ <u>ENVISION 2</u> ALTERNATIVE
23	Revise language to clarify	4-40	"Of the three alternatives, the Envision 2 Alternative would be considered <u>by State CEQA guidelines as</u> the environmentally superior alternative because it does not allow further use of land for single-family development…"

CITY OF LAKE FOREST

Mayor
Kathryn McCullough

Mayor Pro Tem
Scott Voigts

Council Members
Peter Herzog
Marcia Rudolph
Mark Tettemer

City Manager
Robert C. Dunek

February 14, 2012

Jacob Lieb
SCAG
818 W. 7th Street, 12th Floor
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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.

- 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.

- 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.

Sincerely,
CITY OF LAKE FOREST

Gayle Ackerman

Gayle Ackerman, AICP
Director of Development Services

cc Mayor and City Council
Robert C. Dunek, City Manager
Dave Simpson, OCCOG Executive Director