Comments and Responses

PROPOSED FINAL

APRIL 2012

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(ALPHABETICAL)

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001-01	Barry Ross	Alliance for a Healthy Orange County	We are a new organization and we are supportive of this Plan, but we want you to understand the importance that this has in impacting the health of Orange County, particularly in reducing the obesity rate. We hope that the Plan will highlight the health impact that this kind of development can have. We want to work with the cities to help them implement the strategies, and help them see how we can get cities to work together to implement more complete streets, more walkable communities because we believe it will improve the health of the community.	Comment noted. SCAG is committed to working with local jurisdictions in their development, implementation, and maintenance of local active transportation plans; this includes encouraging the adoption of Complete Streets policies.
002-01	Barry Ross	Alliance for a Healthy Orange County	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.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
002-02	Barry Ross	Alliance for a Healthy Orange County	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.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
002-03	Barry Ross	Alliance for a Healthy Orange County	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	Comment noted. SCAG cannot unilaterally change the near term commitments that are already in place. Significant increase in funding for active transportation proposed in the 2012 RTP/SCS

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			sooner.	is largely predicated on additional revenues from new sources that will require future actions at the state and/or federal levels. Therefore, the plan realistically assumes that these funds will not be available in the near term. The earliest these funds are expected to be available is 2026.
002-04	Barry Ross	Alliance for a Healthy Orange County	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.	Comment noted.
002-05	Barry Ross	Alliance for a Healthy Orange County	4. Allocate funding for bicycle and pedestrian planning and usage counts.	Comment noted. SCAG has identified that improved data collection regarding pedestrian and bicycle trip characteristics, facility conditions, and injuries and fatalities is necessary to develop a clear understanding of active transportation conditions. SCAG acknowledges that this data collection is necessary to improve decision makers' understanding of the deficiencies and needs within the existing active transportation system.
002-06	Barry Ross	Alliance for a Healthy Orange County	5. Set aside funding in the RTP to support SCAG cities in developing bicycle and pedestrian master plans, safe routes to school plans and ADA transition plans. Establish a goal that 50% of SCAG cities shall develop these plans by 2016.	Comment noted. SCAG is committed to work with local jurisdictions in the development, implementation, and maintenance of local active transportation plans; this includes the incorporation of Bicycle Plans, Pedestrian Safety Action Plans, Safe Routes to School policies, and ADA compliance.
002-07	Barry Ross	Alliance for a Healthy Orange County	6. Adopt a Regional Complete Streets 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.	Comment noted. SCAG is committed to working with local jurisdictions in their development, implementation, and maintenance of local active transportation plans and policies, including Complete Streets policies.
002-08	Barry Ross	Alliance for a Healthy Orange County	7. Adopt Safe Routes to School regional Strategic Plan by 2014	Comment noted. The Active Transportation Appendix includes Goal 3: Increase Active Transportation Usage in the SCAG Region byComment noted. Adopting a Safe Routes to School Policy. SCAG is committed to working with local jurisdictions in their development, implementation, and maintenance of local active transportation plans and policies, Safe Routes to School policies.
002-09	Barry Ross	Alliance for a Healthy Orange County	8. School Siting and Joint Use Policies should be incorporated as land use elements of the SCS.	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
002-10	Barry Ross	Alliance for a Healthy	9. Set measurable safety and health goals for all users: Goals are set for the reduction of greenhouse gases in the draft 2012	Comment noted. SCAG's Transportation Safety Chapter sets forth goals to reduce transportation related fatalities in

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		Orange County	RTP/SCS. Active transportation plays a pivotal role in the reduction of these greenhouse gases. 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.	absolute numbers. For Bicycling, reduce the number of bicycle roadway fatalities by 25 percent less from their 2000 level. The goal is to also reduce pedestrian fatalities by 25 percent less from their 2000 number.
002-11	Barry Ross	Alliance for a Healthy Orange County	10. Monitoring detailed population data and metrics in environmental justice communities.	Comment noted. A robust environmental justice analysis has been completed and is included in the RTP/SCS Environmental Justice Appendix. SCAG will continue to evaluate and monitor environmental justice impacts at a regional scale.
002-12	Barry Ross	Alliance for a Healthy Orange County	The lack of active transportaiton 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.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
002-13	Barry Ross	Alliance for a Healthy Orange County	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.	Comment noted.
003-01	Jenny Baird	American Lung Association	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	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does

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			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.	not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
003-02	Jenny Baird	American Lung Association	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.	Comment noted. As a scenario planning tool the Rapid Fire model was used to calculate the public health impacts of automobile transportation-related air pollution during the scenario planning process. The number of health incidences, and their related costs, are calculated on the basis of criteria air pollutant emissions (measured in tons). We look forward to working with the American Lung Association to understand the I-THIM screening tool and it's applicability to future SCAG plans.
003-03	Jenny Baird	American Lung Association	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.	Comment noted. The performance metrics were developed with extensive input from SCAG stakeholders and leadership. The Draft PEIR includes a mobile source health risk assessment in Appendix F. The analysis assessed at least one freeway corridor in each of the six counties contained in the SCAG planning area. We look forward to working with the American Lung Association on future efforts to monitor performance. SCAG is interested in continuing to assess health outcomes beyond the RTP.
003-04	Jenny Baird	American Lung Association	Focus investments on completing transit systems and building out transit infrastructure, rather than highway expansion, including the following:. o Doubling Metrolink ridership by 2020 and double it again by 2035 o Expanding Bus Rapid Transit and regional bus service o Enhancing TOD planning and 1st-mile-last-mile investments near Metrolink stations o Doubling the bicycle network to 24,000 miles and improving pedestrian environment	Comment noted. The 2012 RTP/SCS contains three new commuter rail lines, six new rapid bus lines, and an expansion of point to point express bus service. The plan forecasts a 338% rise in commuter rail boardings between 2001 and 2035. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction, which might be a City or County, depending on incorporation. However, SCAG partners with Cities and other jurisdictions to do land use vision exercises through the Compass Blueprint Demonstration Program. This program provides a mix of consultant services, SCAG staff time, financial resources, and technical assistance to local cities, counties, SCAG subregions, and county

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				transportation commissions to help link land use and transportation planning.
003-05	Jenny Baird	American Lung Association	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.	Comment noted. Commented noted. The 2012 RTP/SCS contains three new commuter rail lines, six new rapid bus lines, and an expansion of point to point express bus service. Land use policy around transit stations and amenities fall under the authority of the local governing jurisdiction, which might be a city or County, depending on incorporation. However, SCAG partners with cities to do land use vision exercises through the Compass Blueprint Demonstration Program. This program provides a mix of consultant services, SCAG staff time, financial resources, and technical assistance to local cities, counties, SCAG Subregions, and County Transportation Commissions to help link land use and transportation planning.
003-06	Jenny Baird	American Lung Association	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.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.
003-07	Jenny Baird	American Lung Association	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.	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. This system also offers the opportunity to incentivize the adoption of clean, zero-emission technologies for regional freight movement. SCAG also continues to support efforts by regional partners and stakeholders to address goods movement emissions and impacts on communities such as the San Pedro Bay Ports Clean Air Action Plan. SCAG also supports the implementation of all freight projects listed in the 2012 RTP and continues to work closely with regional implementation agencies to advance their completion. Further, the 2012 RTP includes an Environmental Action Plan that will lead to the deployment of zero emission technologies in the timeframe necessary to meet federal requirements.
003-08	Jenny Baird	American Lung Association	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	Comment noted. Data and analysis included in the Environmental Justice Appendix does not account for Plan improvements in vehicle technology particularly for truck only corridors. These corridors in the Plan are exclusively for zero

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			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.	and/or near-zero emission vehicles. Furthermore, the Program Environmental Impact Report (PEIR) accompanying the RTP/SCS includes mitigation measures that would reduce impacts associated with health risk within 500 feet of freeways and high-traffic volume roadways to less than significant. Analysis included in the Appendix also does not account for emissions improvements through the implementation of these mitigation measures. As such, emissions and exposure analysis shown in this Appendix is abundantly conservative and demonstrates worst-case scenario outcomes. If these emissions improvements had been accounted for, we believe the analysis would show little or no areas with worsened emissions ("hot spots") associated with the Plan. Moreover, the currently available data on emissions and on the distribution of households and population is imprecise such that the overlay with emissions and EJ populations will tend to overstate any potential impacts. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with the mitigation identified and to be implemented as part of the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level.
004-01	Terry Roberts	American Lung Association	The Southern California Association of Governments (SCAG) Sustainable Communities Strategy offers a transformative opportunity to reduce unhealthy vehicle emissions while promoting healthier, more active neighborhoods with reduced rates of chronic disease and premature death.	Comment noted.
004-02	Terry Roberts	American Lung Association	Health professionals support strengthening the Sustainable Communities Strategy to improve health outcomes from healthy land use and transportation planning with the following recommendations: • Increase active transportation investments to more than $10 billion a year. A recent study by the Los Angeles County of Public Health estimated that $40 billion would be needed to build out all of the current bicycle and pedestrian projects in Los Angeles County alone. Analysis needed of how SCAG's bicycle and pedestrian per capita investment compares with other regions.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the

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				plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
004-03	Terry Roberts	American Lung Association	• Assess health benefits through new modeling approaches: Utilize the new California Department of Public Health screening tool to analyze the potential chronic disease reductions in the SCAG region from increased physical activity such as walking and biking and complete this information as soon as possible.	Comment noted. As a scenario planning tool, the Rapid Fire model was used to calculate the public health impacts of automobile transportation-related air pollution during the scenario planning process. The number of health incidences, and their related costs, are calculated on the basis of criteria air pollutant emissions (measured in tons). We look forward to working with the American Lung Association to understand the I-THIM screening tool and it's applicability to future SCAG plans.
004-04	Terry Roberts	American Lung Association	• Broaden the list of public health targets for the SCS to include reductions in air pollution related health impacts, including premature mortality and asthma exacerbations. Work with public health agencies to develop other public health targets.	Comment noted. The performance metrics were developed with extensive input from SCAG stakeholders and leadership. We look forward to working with the American Lung Association on future efforts to monitor performance.
004-05	Terry Roberts	American Lung Association	• Focus investments on completing transit systems and building out transit infrastructure, rather than highway expansion. o Doubling Metrolink ridership by 2020 and double it again by 2035 o Expanding Bus Rapid Transit and regional bus service o Enhancing TOD planning and 1st-mile-last-mile investments near Metrolink stations o Doubling the bicycle network to 24,000 miles and improving pedestrian environment	Comment noted. The RTP includes a significant expansion of rail service including Metrolink and California High-Speed Rail. It also includes an expansion of BRT and express bus services, increased frequencies of local fixed-route bus, and a significant increase in funding for bicycle and pedestrian facilities.
004-06	Terry Roberts	American Lung Association	• Front load active transportation funding, including transit, so that projects are completed early in the 25-year RTP process.	Comment noted. SCAG cannot unilaterally change the near term commitments that are already in place. Significant increase in funding for active transportation proposed in the 2012 RTP/SCS is largely predicated on additional revenues from new sources that will require future actions at the state and/or federal levels. Therefore, the plan realistically assumes that these funds will not be available in the near term. The earliest these funds are expected to be available is 2026.
004-07	Terry Roberts	American Lung Association	• Increase investments in zero emission freight transportation in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards.	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. This system also offers the opportunity to incentivize the adoption of clean, zero-emission technologies for regional freight movement. SCAG also continues to support efforts by regional partners and stakeholders to address goods movement emissions and impacts on communities such as the San Pedro Bay Ports Clean Air Action Plan. SCAG also supports the implementation of all

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				freight projects listed in the 2012 RTP and continues to work closely with regional implementation agencies to advance their completion. Further, the 2012 RTP includes an Environmental Action Plan that will lead to the deployment of zero emission technologies in the timeframe necessary to meet federal requirements.
004-08	Terry Roberts	American Lung Association	• Evaluate the number and type of new developments that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP. Work with air district, health departments and universities to develop best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.	Comment noted. Please see Table 43 on Page 121 in the Draft Environmental Justice Appendix for household and job growth in the High Quality Transit Areas (HQTA) that are also in close proximity to freeways and high traffic roadways under RTP.
005-01	Mark Capron	American Society of Civil Engineers	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.	Comment noted.
005-02	Mark Capron	American Society of Civil Engineers	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. 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. Increasingly distracted drivers are more likely to kill pedestrians and bicyclists, with more adverse impacts on TDM and safety. - Pedestrians and bicyclists are distracted reading their digital device and oblivious to outside sounds wearing earphones. - As of 2009, anyone with a smart	Comment noted.

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			phone had access to real-time (and very distracting) visual indications of traffic conditions on their alternate routes. 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%. 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.	
005-03	Mark Capron	American Society of Civil Engineers	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 supercomputer. 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. Our vision includes pushing the connectivity and computing power of 2010 to address the transportation challenges of 2020, 2030, and beyond.	Comment noted. The development of automated vehicles is proceeding rapidly, but is still in a preliminary phase, and will be examined in future plans.
005-04	Mark Capron	American Society of Civil	At the end of the Financial Plan Executive Summary pages 7 and 8, add: REDUCED INSURANCE COSTS Drivers and businesses in	Comment noted.

ID	Name	Affiliation	Comment	Response
		Engineers	the SCAG region paid about $25 billion in 2010 for vehicle insurance. 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. Digital systems would save drivers and businesses about $240 billion on insurance premiums over the twenty years between 2015 and 2035. 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. The insurance and time savings more than justify the increased gas tax and mileage-based user fee suggested in Table 2 with directly offsetting savings for drivers and business.	
005-05	Mark Capron	American Society of Civil Engineers	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. - 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. - 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. - More gamification 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. - Cargo-pooling for mail, hardcopy messages, tools, equipment, food, etc.	Comment noted.
005-06	Mark Capron	American Society of Civil	Motivation The author's research for the Santa Barbara Community	Comment noted.

ID	Name	Affiliation	Comment	Response
		Engineers	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 Plan22 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 Office23 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. 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.	
005-07	Mark Capron	American Society of Civil Engineers	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.	Comment noted.
005-08	Mark Capron	American Society of Civil	SCAG might pay the smart phone-transit service a fee to obtain ridership data for adjusting routes and fares to minimize both	Comment noted.

ID	Name	Affiliation	Comment	Response
		Engineers	vehicle-miles and passenger-miles per- gallon.	
005-09	Mark Capron	American Society of Civil Engineers	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.	Comment noted.
005-10	Mark Capron	American Society of Civil Engineers	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.	Comment noted.
005-11	Mark Capron	American Society of Civil Engineers	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 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. Electronics is way cheaper than car insurance. In 2005, General Motors engineers estimated $200 per car to upgrade OnStar to zero-crash, zero-congestion. Of course, most other cars would have to be similarly outfitted for this low-cost approach. Example actions Allow, beginning	Comment noted.

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			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.	
006-01	Richard Mueller	Ameron International Corporation Water Transmission Group	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	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing collaboration with stakeholders and transportation interests to identify potential solutions to regional freight challenges.

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			and make freight transportation to and through southern California competitive with that anywhere in the world. Sincerely, Ameron International Corporation Water Transmission Group	
007-01	Ann Wilson	Arroyo Verdugo Subregion	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," must "address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance". 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.	Comment noted. However, SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. The full text of the federal requirements can be found in 23 CFR 450.322. The applicable federal regulations clearly indicate an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained."
007-02	Ann Wilson	Arroyo Verdugo Subregion	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:	Comment noted. SCAG will continue to work with the county transportation commissions and stakeholders to develop and refine performance measures and, to the extent practicable, conduct project-level performance assessments as appropriate and necessary.
007-03	Ann Wilson	Arroyo Verdugo Subregion	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.	Comment noted. The distribution of funding for different transportation investments in the RTP is a result of local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.

ID	Name	Affiliation	Comment	Response
007-04	Ann Wilson	Arroyo Verdugo Subregion	The term "SR-710 Gap Closure" used in the plan should be substituted with "710 North Extension": The "SR-710 Gap Closure" language, already used 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 Nort 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.	Comment noted. References to the “SR-710 Gap Closure” have been revised to “SR-710 Transportation Improvement Options”.
007-05	Ann Wilson	Arroyo Verdugo Subregion	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 PEIR 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 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 of 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.	Comment noted. Increase in total VMT in 2035 over the current condition is primarily due to estimated increase of 4 million people over the plan period. However, VMT on a per capita basis will decrease over this period once the plan is fully implemented. While the Plan does include some needed highway improvements, including the SR-710 Transportation Improvement Options project, there is no evidence that these improvements would contribute to the total VMT increase in any discernible way. The 2012 RTP identifies a multi-modal strategy that incorporates transit, highway, and active transportation strategies as well as demand management and congestion pricing strategies to achieve overall improved system performance and reduction in GHG targets required under SB 375.
007-06	Ann Wilson	Arroyo Verdugo	The definition of the SR-710 gap closure project from one precise point to another threatens program-level conformity in	Comment noted. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of

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		Subregion	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.	that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
007-07	Ann Wilson	Arroyo Verdugo Subregion	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 1.
008-01	Lacy Kelly	Association of California Cities Orange County	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.	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations be consistent with the SCS. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.
008-02	Lacy Kelly	Association of California Cities 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.	Comment noted. We agree that additional work is needed before the mileage-based user fee would become effective, which is basis for assumption that implementation begins after 2025. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent

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				with recommendations from two national commissions established by Congress through SAFETEA-LU. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
008-03	Lacy Kelly	Association of California Cities Orange County	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 3.
009-01	Marianne Kim	Automobile Club of Southern California	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.	Comment noted. The RTP's financial plan reflects reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees, discussed with stakeholders and documented in the Draft RTP to ensure transparency. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
009-02	Marianne Kim	Automobile Club of Southern California	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.	Comment noted. The RTP includes the local option sales tax measures and their associated projects as submitted by the county transportation commissions.
009-03	Marianne Kim	Automobile Club of Southern California	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.	Comment noted. We agree but would like to reference a minor clarification with respect to the gas tax rates that is detailed in the Transportation Finance Appendix. The state gas tax rates are updated annually as described in the text (see "state gas tax swap") but remain revenue neutral.
009-04	Marianne Kim	Automobile Club of Southern California	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	Comment noted. A regional gas tax has not been considered for inclusion in the RTP.

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			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.	
009-05	Marianne Kim	Automobile Club of Southern California	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 charge 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.	Comment noted. We agree that additional work is needed before the mileage-based user fee would become effective, which is basis for assumption that implementation begins after 2025. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. The investments in the RTP, including all revenue sources, provide a return of $2.90 for every dollar invested.
009-06	Marianne Kim	Automobile Club of Southern California	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.	Comment noted. No tolls are proposed to be imposed on existing general purpose lanes.
009-07	Marianne Kim	Automobile Club of Southern California	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	Comment noted. The RTP/SCS includes additional means to reduce GHG including alternative automobile technologies and better system preservation and management. The RTP/SCS also intends to offer options and build sustainable communities in our region, which is above and beyond achieving the SB 375 GHG reduction targets.

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			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.	
010-01	Neal Richman	BREATHE LA	Breathe LA supports the comments in the Climate Plan sign-on letter in response to the SCAG RTP/SCS for 2012. We see both strengths and shortcomings in this planning document and hope that, to the extent feasible, issues that are identified by the Climate Plan coalition will be remedied before final adoption. In addition to these recommendations, Breathe LA seeks to express its concern that the RTP/SCS may underestimate the actual impact of pollution in areas adjacent to freeways and highly traveled corridors because current planning methods do not fully consider the health consequences of ultrafine diesel particulates. The RTP/SCS focuses on the impact of PM10 and PM2.5. However, there is growing evidence of the adverse health effects of ultrafine diesel particulate matter that is composed of carbon, organic compounds, metals, and other trace elements. For a number of reasons ultrafine particles (less than 0.1 microns in width) are not yet regulated. Air quality standards are based on mass concentration for particulate matter. However, the health effect of ultrafine particles (UFPs) seems to occur through particle number concentration, not mass concentration. UFPs are a small proportion by mass, but a large proportion by number. Because of their extremely small size, UFPs can penetrate deep into the lung tissue, circulate throughout the body, and become deposited within cellular structures. The main sources of diesel exhaust range from trucks and cars to locomotives, ships, and industrial equipment. In Los Angeles County, about 70% of air quality risk is derived from diesel particulate emissions, especially from mobile sources. Concentrations of UFPs are greatest around freeways with truck traffic and begin to decrease as the distance away from freeways increases. The RTP/SCS does point out the potential impact of roadside pollutants by noting the high concentration of vulnerable residents who live and work in	Comment noted. SCAG will provide information that details the overall results and conclusions related to environmental justice for the 2012 RTP/SCS. Anticipated items of note: 1) Region-wide environmental performance related to emissions is mostly improved from the base year, and also shows improvement when comparing the plan to the baseline scenario. 2) Information on emissions impacts for areas within 1,000 feet of highways will be included as an addendum to the Environmental Justice (EJ) Appendix. While the EJ analysis in the Draft RTP did show some locations with emissions increases, this analysis did not account for plan improvements in vehicle technology particularly for truck only corridors. These corridors in the plan are exclusively for zero and near-zero emission vehicles. If these emission improvements had been accounted for we believe the analysis would show no hot spots associated with the plan. As such, the emissions and exposure analysis shown in the Draft EJ Appendix is abundantly conservative and demonstrating worst-case scenario outcomes. Even in the event that hot spots remain after accounting for vehicle technology improvements, there is no reliable way to conclude hot spots would overlay with EJ communities. Neither the available data on emissions nor on distribution of households and population is at a precise enough level of geography to show where they would intersect. SCAG is very much aware of the competing interests between near roadway exposures and health benefits from TODs as a result of active transportation opportunity. SCAG encourages research and studies to further explore feasible mitigation measures. Please note that the near roadway exposures affect not only the residents but also commuters, travelers, and near-roadway workforce including offices, retails, services, and visitors, etc.

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			areas that are adjacent to freeways and highly traveled corridors. The RTP/SCS states: "…freeway adjacent areas account for just 1 percent of the SCAG land area but accommodate 5.8 percent of regional households and less than 10 percent of total SCAG region jobs. There are disproportionately higher concentrations of Environmental Justice Communities in the freeway adjacent areas both currently in our 2035 projection" Moreover, as the RTP/SCS states: "The 2012 RTP/SCS land use strategy calls for redirecting future growth into HQTA (High Quality Transit Areas) As a result, part of the growth will occur in areas where HQTA is overlapping within 500 feet freeway buffer areas." The question remains how "high quality" can an HQTA be if it is within a 500 foot buffer area. Of particular concern is the risks posed by incompatible land use, including sensitive receptors such as hospitals, senior/day centers, and housing near freeway and busy roadways. ● First, it would be helpful to identify those portions of the HQTA's which are healthy for new residential development and which are not. As noted, the health risks from fine particulate matter decrease rapidly the further the particles are measured from a source. Some areas of the HQTA's might be very appropriate for development while in another location this would not be the case. ● Portions of HQTAs where new residential development is not advisable will have higher health risk from toxic air contaminants like diesel particulate matter. These portions can be determined by applying guidelines developed by the California Air Resources Board (CARB) that recommend that sensitive land uses not be sited within 1000 feet of rail yards, warehouses, and distribution centers. The guidelines also recommend that sensitive land uses not be sited within 500 feet of freeways, without appropriate mitigations to minimize this risk. ● Support wise infill development by incentivizing the development of housing and sensitive land uses like parks and schools outside portions of HQTAs with higher health risk from toxic air contaminants. Encourage siting more suitable land uses such as commercial and light industrial land uses within higher health risk portions of HQTAs. ● Encourage local jurisdictions to require mitigation measures for proposed residential developments within portions of HQTAs with the highest health risk from toxic air contaminants. The	However, regionwide air quality is improving with the plan comparing to either today's condition or future year without the plan. Moreover, while the regional air quality is improving, the freeway adjacent areas' air quality is improving even more substantially. Finally, while SCAG encourages future growth in the HQTA, only 22% of the growth increment occurs within the 500 feet roadway buffer areas. The Environmental Justice appendix also includes a mitigation toolbox to minimize exposure to environmental harm, where feasible and appropriate. SCAG will include potential resources to address gentrification in the EJ appendix. We look forward to continuing to work with environmental justice stakeholders on these important issues. The RTP/SCS does result in an increase in population in these locations, however, and as such health risk could be higher for these individuals than if they were not in the buffer area.

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			appropriate mitigation measures required to reduce health risk posed by the proposed development should be identified based on detailed modeling and assessment of local conditions at and surrounding the site, including proximity to freight-related hazards and empirically counted amounts of diesel truck and train traffic moving through the area. Specifically, mitigation measures can be put in place by developers to meet the required conditions for zoning approval. These measures range from indoor air filtration and monitoring to site re-design that locates sensitive receptors as far away as possible from sources of air pollution. To address potential adverse health impacts, mitigation measures in proposed housing developments areas might include: 1) Install HEPA indoor air filtration systems designed to filter out toxic air contaminants including fine particulate matter (PM 2.5); 2) Use triple-paned, sealed, and non-operational windows that reduce the impact of vibrations from freight traffic and minimize outdoor air contaminant flow into indoor spaces; 3) Use green, healthy building materials that do not off-gas or release air toxins that compromise indoor air quality; 4) Include adequate green space, vegetative planting, and permeable surface area that is well-maintained incorporated into development design and management plans; 5) Minimize parking allocations in the development to reduce congestion and air pollution from additional automobile traffic and stalled freight traffic, and incentivize the use of transit, car-sharing, and zero-emission electric vehicles by integrating chargers into the design of parking garage areas; 6) Design developments to capture polluted runoff from the sides of buildings and other outdoor surfaces that have accumulated diesel soot and other contaminants so that such contaminants do not flow into green spaces in the development; 7) Design developments to equitably distribute the health risk from toxic air contaminants posed by the development across all units in the development (eg do not locate affordable housing units in the least desirable areas of the development closest to freight transport facilities and corridors like freeways); 8) Notify prospective residents within the deed or lease document for the property of the hours of operation of freight transport facilities and their related noise, air quality, light pollution, and health impacts; Growth in HQTAs is needed, we believe that such	

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			measures might be ways to encourage additional density near transit hubs while simultaneously protecting public health. There needs to be further discussion of these types of ideas to determine which are most appropriate and feasible in each set of circumstances. Many of these recommendations were put forth by public health and environmental organizations in response to the publication of the Sustainable Communities Strategy by the Association of Bay Area Governments. To the greatest extent feasible, such air pollution mitigation strategies should not be developed by each region independently, but rather should be reflected in statewide policies that promote health and environmental justice throughout California.	
011-01	Scott Goldie	Brooks Street	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.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
011-02	Scott Goldie	Brooks Street	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	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level. The TAZ-level dataset was provided upon request during the comment period.

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			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	

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			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.	
011-03	Scott Goldie	Brooks Street	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	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. There is no intent to impact the local entitlement process. In some cases, SCAG altered small area land use assumptions to better reflect trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.

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			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).)	
011-04	Scott Goldie	Brooks Street	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	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. There is no intent to impact the local entitlement process. In some cases, SCAG altered small area land use assumptions to better reflect trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.

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			intensities within the region more precisely down to a TAZ level. Instead, SCAG should appropriately identify these characteristics at a level consistent with the need for reasonable flexibility and local control. At the lowest, the level of comparison should be at a jurisdictional level – particularly given that there are nearly 200 jurisdictions within the SCAG region. Accordingly, we urge SCAG to identify such characteristics at no finer a scale than at the lesser of (i) the jurisdiction, and (ii) the sub-region (i.e., where unincorporated county land is divided into sub-regions). Despite SB 375's mandate that the SCS not regulate land use, the draft RTP/SCS "shifts" households "from the periphery into the urbanized core" stating that much of this shift "will occur naturally in the marketplace," and that this "shift" was done "per consultation with the local jurisdictions." (Draft RTP/SCS p. 128.) However, this shift does not "occur naturally," nor through a "consultation" process between agency staff that excludes the public. Instead, such a shift can only occur, if at all, as part of a separate and lengthy discretionary development application process involving requests to local land use jurisdictions to amend their general plans, specific plans, areas plans, and zoning. In short, there is no "shift" to high-density housing in some local jurisdictions, and away from housing density already approved by other jurisdictions, unless and until the local land use jurisdictions adopt the requested discretionary approvals.	
012-01	Andrew Henderson	Building Industry Association of Southern California	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	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			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.	
012-02	Andrew Henderson	Building Industry Association of Southern California	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	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			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).	
012-03	Andrew Henderson	Building Industry Association of Southern California	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	Comment noted. The final RTP/SCS was revised to address the comment. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 369 (emphasis added).	
012-04	Andrew Henderson	Building Industry Association of Southern California	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.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
012-05	Andrew Henderson	Building Industry Association of Southern California	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	Comment noted. We may consider longer-term planning in future RTPs.

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			other interested stakeholders about a more feasible, longer-term regional planning effort.	
012-06	Andrew Henderson	Building Industry Association of Southern California	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."	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
012-07	Andrew Henderson	Building Industry Association of Southern California	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	Comment noted. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. For more information regarding the requested PEIR revisions, please see the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 4.

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			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).	
012-08	Andrew Henderson	Building Industry Association of Southern California	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	Comment noted. SCAG's SCS is based upon local input from local jurisdictions through more than two years of collaboration with local governments, demographers, economists and other stakeholders; and SB 375 does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority. For additional response, please see the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 4.

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			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).	
012-09	Andrew Henderson	Building Industry Association of Southern California	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 4.
013-01	Andrew Henderson	Building Industry Association of Southern California	There may be a need to take a better look at some of the spacial dispersion that's indicated by the policy document. See if there is a way to allow a little bit of flexibility or adjustment where it needs to occur. You could do that without doing any real injury to the overall benefits of the RTP/SCS in redirecting the shape of the community in the future more towards transit orientation. The BIA worries that there are some unintended consequences that the methodology that lead to the spacial dispersion was in hindsight to insular in interacting between the cities and counties in the region without enough public vetting. And as a consequence of that, there are perhaps some areas where there is absolute foreseeable growth that is not well reflected in the SCS.	Comment noted.
014-01	Don Feger	Burbank-Glendale-Pasadena Airport Authority	An important concern with the "Aviation and Ground Access" report is the assumption that the projected annual passenger demand for BUR would be 9.4 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 BUR in 2035. SCAG cites the assumed "constraint" of a 78.9 MAP Settlement Agreement at LAX as the driver for t his 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 MAP. While the	Comment noted. The 2035 air passenger forecasts in the Final 2012 RTP/SCS will be caveated to reflect that the 78.9 MAP Settlement Agreement constraint at LAX expires in 2020, and that any new information provided to SCAG by an individual airport authority on legally-allowable or defined physical capacity constraints at their airports will be reflected in future aviation demand forecasts developed by SCAG (such as for the 2016 RTP). The forecasts will also be caveated to indicate that any relaxation of the 78.9 MAP forecast constraint at LAX would significantly impact the passenger demand forecast at Bob Hope Airport (BUR), and that Bob Hope Airport management believes that the 2035 passenger demand forecast for Bob Hope Airport should be less than 8 MAP.

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			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 withing 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.	
014-02	Don Feger	Burbank-Glendale-Pasadena Airport Authority	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 t he 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 MOU 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 incorportated into the RTP.	Comment noted. As discussed with OLDA, the Northern Corridor may be added to the Constrained Plan through a future RTP amendment.
015-01	Ron Krueper	California Department of Parks and Recreation	We offer the following suggestions regarding the Conservation Policy: 1. Ensuring State conservancies and join 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 and Lower Los Angeles Rivers and Mountains Conservancy, Mountains Recreation and Conservation Authority, and Santa Monica Mountain Conservancy among the	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include input from a wide variety of stakeholders, including the groups listed. SCAG also intends to include all applicable protected areas, not just NCCP/HCP areas. Language will be clarified. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on

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			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 Plan and Habitat Conservation Plan Areas. 3. Ensuring existing wildlife corridors and habitat linkages and highway/roadway under-crossings 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.	wildlife species and habitat fragmentation.
015-02	Ron Krueper	California Department of Parks and Recreation	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 SCAG on the development of the Natural Lands Acquisition and Open Space Conservancy Strategy. This will protect remaining resource lands and mitigate for impacts from transportation investments. In addition to mitigation banking, transfer of development rights, and payment 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.	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, based on input from a wide variety of stakeholders. Language has been clarified.
015-03	Ron Krueper	California Department of Parks and Recreation	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	Comment noted. SCAG recognizes that additional preservation tools exist. We look forward to working with the California Department of Parks and Recreation to discuss conservation strategies with our regional stakeholders. Clarification language will be added to denote that the summary language is not exhaustive. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.

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			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 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.	
015-04	Ron Krueper	California Department of Parks and Recreation	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 86.
016-01	Linda Rudolph	California Department of Public Health	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. Many strategies that increase community sustainability can also support improved health outcomes.	Comment noted.
016-02	Linda Rudolph	California Department of Public Health	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.) 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. 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	Comment noted. The performance measures portion of the 2012-2035 RTP/SCS has been developed through extensive participation and input from stakeholders in the region, as well as collaboration with other large MPOs in the state. For example, to facilitate the dialogue and development of performance measures for the 2012-2035 RTP/SCS, a Performance Measures Subcommittee was established in May 2011. The Subcommittee met and gathered extensive input from various stakeholders and provided recommendations to

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			assessment at most MPOs. As tools such as the Integrated Transport and Health Impacts Model 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. Using these tools, health co-benefits can be used as a criterion to screen projects for cost-benefit and other in-depth analysis.	the Plans and Programs Technical Advisory Committee for further discussions prior to forwarding to the Policy Committees. As a result of the input process and deliberations, over 20 new performance measures have been added to the RTP/SCS including new categories such as location efficiency. Staff will continue investigating additional measures for future plan updates. Also, SCAG is currently in the process of enhancing our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. By integrating health impacts data into this land use and transportation simulation tool, users can assess the health related outcomes associated with changes in the built environment. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016.
016-03	Linda Rudolph	California Department of Public Health	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. This is a promising approach that deserves more attention.	Comment noted. SCAG is currently in the process of enhancing our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. By integrating health impacts data into this land use and transportation simulation tool, users can assess the health related outcomes associated with changes in the built environment. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016. SCAG looks forward to learning more about the Sustainable Transportation Council's approach and how it may be integrated with future efforts.
016-04	Linda Rudolph	California Department of Public Health	Local health departments are highly interested and would benefit from mechanisms that enhance their participation in SCS development and follow-up. It is worth exploring ways local health departments and others interested in public health and equity can stay engaged on an on-going basis.	Comment noted. SCAG looks forward to exploring opportunities to engage local health departments and others interested in public health and equity.
017-01	James McCarthy	California Department of Transportation	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	Comment noted. We agree that government, business, and user stakeholders need to work together to identify and advance the best, most appropriate funding options to provide needed

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			collaboration and consensus-building with Federal, State and Local partners as these strategies and funding sources are pursued.	funding for RTP priorities.
017-02	James McCarthy	California Department of Transportation	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.	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
017-03	James McCarthy	California Department of Transportation	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.	Comment noted.
017-04	James McCarthy	California Department of Transportation	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.	Comment noted. As described on page 34, the chosen alternative is the RTP/SCS (Plan), which is described in detail in the succeeding chapters of the document.
017-05	James McCarthy	California Department of Transportation	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.	Comment noted. The SCS Background Documentation Appendix outlines how the 2012 RTP/SCS preferred alternative was chosen.
017-06	James McCarthy	California Department of Transportation	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.	Comment noted. The text of this paragraph has been revised to reflect that without improving the regional ground access system, increasing ground access congestion may also hamper air cargo trucks in accessing airports and making deliveries in a timely fashion.
017-07	James McCarthy	California Department of Transportation	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.	Comment noted. The Calexico-East international border crossing handles the vast majority of commercial traffic between the U.S. and Mexico. However, the Andrade-Los Algadones border crossing also handles some commercial traffic. SCAG will revise the information appropriately.
017-08	James McCarthy	California Department of Transportation	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.	Comment noted. While agriculture is a major industry in Southern California, the 2012 RTP focused on the top goods movement dependent industries which included manufacturing, construction, and retail trade.

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			http://www.cfbf.com/counties/index.cfm	
017-09	James McCarthy	California Department of Transportation	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."	Comment noted. SCAG currently indicates in the RTP the import/export value of goods moving across the international border totals over $10 billion ($7 billion in imports/$5 billion in exports). While the Calexico-East international border crossing handles the vast majority of commercial traffic between the U.S. and Mexico, the Andrade-Los Algadones border crossing also handles some commercial traffic. SCAG has revised the information regarding the number of vehicle crossing as appropriate.
017-10	James McCarthy	California Department of Transportation	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).	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. SCAG will review the language and revise to strengthen the connection as appropriate.
017-11	James McCarthy	California Department of Transportation	Trip Planners: Please consider incorporating future updates of transit route data in trip planning tools such as Google Transit or Go511.com.	Comment noted.
017-12	James McCarthy	California Department of Transportation	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.	Comment noted. The Final RTP incorporates this comment.
017-13	James McCarthy	California Department of Transportation	Page 31- Connectivity measures need to include a high degree of reliability (on-time performance to meet connections with other modes).	Comment noted. On-time performance is critical in increasing transit connectivity opportunities.
017-14	James McCarthy	California Department of Transportation	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.	Comment noted. The "State of the System" report in the Transit Appendix included a detailed analysis of the effects of high gas prices and the recession on transit ridership over the last three years. The "System Performance: Benchmarking to Peer Regions" looked at variables such as the inflation rate and CPI on operations and maintenance costs for transit providers in our region.
017-15	James	California	It should be noted that Caltrans has not done an analysis of the	Comment noted.

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	McCarthy	Department of Transportation	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	
017-16	James McCarthy	California Department of Transportation	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.	Comment noted. The Final 2012 RTP/SCS addresses this comment.
017-17	James McCarthy	California Department of Transportation	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.	Comment noted.
017-18	James McCarthy	California Department of Transportation	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.	Comment noted.
017-19	James McCarthy	California Department of Transportation	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.	Comment noted. This project is listed as RTP ID# S2120033 in the Strategic Plan portion of the Project List.
017-20	James McCarthy	California Department of Transportation	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.	Comment noted. SCAG has addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
017-21	James McCarthy	California Department of Transportation	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.	Comment noted. SCAG has addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
017-22	James McCarthy	California Department of	Page 15 - Caltrans encourages SCAG to coordinate with Caltrans Districts and regional partners to ensure consistency with	Comment noted. SCAG will continue to work with Caltrans Districts and regional partners on these matters.

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		Transportation	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.	
017-23	James McCarthy	California Department of Transportation	Page 3 - under OR SR-71 should read SR-73 and where it says SB SR-210 should be I-210.	Comment noted. Table 2 has been corrected for SR-73 and I-210.
017-24	James McCarthy	California Department of Transportation	SB 391 and the California Interregional Blueprint should be mentioned among related initiatives.	Comment noted. The Final 2012 RTP/SCS reflects the inclusion of SB 391, implementing legislation requiring Caltrans to update the California Transportation Plan to show how it is implementing the goals and requirements of AB 32 and SB 375, and will mention the California Interregional Blueprint among related initiatives.
017-25	James McCarthy	California Department of Transportation	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 82.
018-01	Kirk Marckwald	California Environmental Associates	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 in attachment). At a minimum, the RTP should note that these issues are unresolved.	Comment noted.
018-02	Kirk Marckwald	California Environmental Associates	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	Comment noted. Further clarification about funding and technology readiness has been provided in the text of the RTP as appropriate. We recognize that SCAG does not have the authority to require the Railroads to participate in or provide funds for any technology evaluation effort. The RTP language was not intended to suggest any requirements. The language has been clarified as appropriate.

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			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.	
018-03	Kirk Marckwald	California Environmental Associates	[Page 74, sentence beginning with "For the near-term, the regional strategy supports the deployment of..."] 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 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."	Comment noted.
018-04	Kirk Marckwald	California Environmental Associates	[Page 74, sentence beginning with "In the longer term, the strategy focuses on a more fundamental shift in technology..."]: 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-	Comment noted. We agree that any regional decisions should include the input of all stakeholders. We have clarified the text to strengthen this point. Additionally, We agree that new technologies must not compromise the operations of the goods movement system.

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			emission or near zero-emission freight system" could be implemented.	
018-05	Kirk Marckwald	California Environmental Associates	[Page 75, Table 2.11]: 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 electrification of a freight rail system or the associated emission reductions. Please refer to the attached issue briefs for more information on electrification.	Comment noted. The methodology for the emission reduction estimates that you refer to is available in the SCAG study "Analysis of Freight Rail Electrification in the SCAG region." Please refer to this document for details on these calculations.
018-06	Kirk Marckwald	California Environmental Associates	[Page 70, sentence beginning with "In past RTPs, SCAG has envisioned a system of truck-only lanes..."]: 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 further opportunities for businesses to become rail served.	Comment noted. The East-West Freight Corridor alignment identified as part of the 2012 RTP would be further analyzed in more detail through an Environmental Impact Report (EIR) and other alignments would be considered through an alternatives analysis as part of that EIR. SCAG intends to continue to work closely with its partners and industry stakeholders, including UP Railroad, on next steps related to the East-West Freight Corridor.
018-07	Kirk Marckwald	California Environmental Associates	[EJ Appendix, page 136]: Both Exhibit 34 and SCAG's conclusion referencing it are fundamentally flawed; the conclusions presented are unfounded and SCAG does not provide supporting 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. Additionally, the data presented in the EJ 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 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. SCAG must either remove Exhibit 34 and misleading discussion language, or substantially revise it and provide the source data. If SCAG keeps Exhibit 34, it must present identical maps and	Comment noted. Exhibit 34 and related discussion will be deleted from the Final Environmental Justice Appendix, since this map is misleading as cancer risks identified in this map are associated with sources of pollution that include but are not limited to rail-related pollution sources. It is important to note that the cancer risk data shown in Exhibit 34 in the Draft Environmental Justice Appendix is the same data utilized for the map shown in Exhibit 26, which depicts cancer risks related to rail and other mobile pollution sources. Also included in the Final Environmental Justice Appedix is a detailed discussion on the methodology used to develop this dataset.

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			analyses for arterials, highways, and other transportation sources discussed in the plan, such as airports. 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. [refer to letter for comment details, pp. 10-13]	
018-08	Kirk Marckwald	California Environmental Associates	[EJ Appendix]: 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. When analyzing 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. This arbitrary selection affects not only the evaluation of local impacts from rail, but also the assessment of whether the impacted communities are in fact EJ communities. We would like to see more information on how SCAG reached its conclusions that rail disproportionately impacts EJ versus non-EJ communities. SCAG does not show a rational basis for these conclusions. SCAG does not provide any justification for the difference between buffer distances around rail versus highways and arterials used in the analysis. 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. Further, although SCAG broadly states that rail remissions are significant on page 131, SCAG does not quantify actual emissions. Quantification of rail emissions and the comparison between emissions from trucks on highways and rail in the region is critical to understanding freight transportation tradeoffs, the context under which rail investments are made, and the potential shifts between transportation modes [refer to letter for comment details, pp. 13-14]	Comment noted. In the Final Environmental Justice Appendix, the buffer areas of study surrounding rail lines has been adjusted to improve their parity with similar analysis in the report for highways and arterials as needed. Text describing rail related emissions has been revised as appropriate.
018-09	Kirk Marckwald	California Environmental Associates	[EJ Appendix] SCAG needs to clearly state whether the rail mitigation measures in the EJ Appendix are a part of the resource-constrained plan or a part of the strategic plan. SCAG	Comment noted. SCAG examined rail impacts at the request of the Federal Highway Administration. The Environmental Justice Mitigation Toolbox in the EJ Appendix provides a list of

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			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. First, SCAG recommends the acceleration of cleaner line-haul locomotives. At this time, these new technologies are untested and unproven in line haul locomotive applications. Second, the EJ appendix recommends the installation of sound barriers and acoustical insulation. 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 Railroad's 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 FRA and therefore fall outside the authority of SCAG. Accordingly, this strategy should be removed from the EJ appendix. [refer to letter for comment details, pp. 15-16]	voluntary measures that could help address environmental justice concerns, if feasible and applicable in future projects. These recommendations were developed consistently with the Draft PEIR and have been revised consistent with the Final PEIR to clarify that they are voluntary and do not create a requirement on project sponsors. SCAG will remove the reference to electrification, the acceleration of cleaner line-haul locomotives, acquiring rights-of-way, and acoustical insulation in the Environmental Justice Appendix. The measure referencing construction of sound barriers have been revised to emphasize that the measures are voluntary and the measure referencing limits on operation has been removed.
018-10	Kirk Marckwald	California Environmental Associates	[EJ Appendix, page 145, sentence beginning with "Additionally, the 2012 RTP proposes railroad electrification..."]: 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.	Comment noted. SCAG will remove the reference to electrification in the EJ Appendix. The Environmental Justice Mitigation Toolbox provides a list of voluntary measures that could help address environmental justice concerns for future projects, if feasible and applicable. Clarification language has been added to the Environmental Justice Mitigation toolbox.
018-11	Kirk Marckwald	California Environmental Associates	[EJ Appendix, page 131, sentence beginning with "Environmental pollution from locomotives, rail yards and other rail facilities..."]: 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	Comment noted. SCAG concurs that rail emissions is proportionally a small contribution to regional PM and NOx emissions. As described in the goods movement technical appendix (p 32 in the Draft Environmental Justice Appendix) rail emissions are 5% and 4% of regional goods movement related

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			lines and urban lines accounted for? In 2010, ARB estimates locomotives contributed less than one percent of PM2.5 emissions and less than three percent of NOx emissions in the South Coast Air Basin. 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 PM2.5, respectively. Despite this, SCAG portrays rail emissions as regionally significant in the EJ 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 US move through the Southern California ports. 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.	NOx and PM emissions, respectively. The revised language clarifies that while this is a relatively low contribution, concentrations of rail activities can result in localized rail pollution hot spots. Text in the EJ Appendix has been clarified and will specify that analysis includes passenger and freight rail.
018-12	Kirk Marckwald	California Environmental Associates	[EJ Appendix, page 145, sentence beginning with "The train traffic index of each railroad segment is calculated..."]: SCAG uses the results of the train traffic index to suggest the relative level of impact on different rail segments. Did SCAG include passenger trains in this index? SCAG should state whether Exhibit 36 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, SCAG should show relative improvement gained through completion of Colton Crossing and other near-term grade separations. 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 traffic	Comment noted. The train traffic index of each railroad segment is calculated by using average daily train volume, including both passenger rail and freight rail, multiplied by daily total gate down time of two grade crossings located at both ends of the segment. The section related to train traffic has been clarified and modified as appropriate to account for your questions and suggestions.

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			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.	
018-13	Kirk Marckwald	California Environmental Associates	[Goods Movement Appendix, page 34]: 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 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. 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. 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. 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.	Comment noted. Funding for research, development and demonstration has been further clarified in the text of the RTP. We agree that any regional decisions should include the input of all stakeholders involved. We have clarified the text to strengthen this point and address your concerns. Comments concerning timeframes are noted.
018-14	Kirk Marckwald	California Environmental	[Goods Movement Appendix, page 36, sentence beginning with "Phase 2 also includes initial proof of concept..."]: SCAG should	Comment noted.

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		Associates	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 point.	
018-15	Kirk Marckwald	California Environmental Associates	[Goods Movement Appendix, page 39]: 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" into the 2012 Agency Action section. Specifically: 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?	Comment noted.
018-16	Kirk Marckwald	California Environmental Associates	[Goods Movement Appendix, page 42, sentence beginning with "Because of the cost and potential operation challenges..."]: 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.	Comment noted. Mainline electrification is not part of the constrained or strategic plan. As stated in the RTP, SCAG will work with regional stakeholders to further study applicability for the region. The text was not intended to suggest a requirement; rather, it indicates that any effort to construct an

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			Additionally, SCAG should explain what is meant by the statement that SCAG would require the "cooperation by the BNSF and UP railways."	electrified rail system would need the participation of both railroads.
018-17	Kirk Marckwald	California Environmental Associates	[Goods Movement Appendix, page 42, sentence beginning with "Two promising technologies that are under development..."]: 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.	Comment noted. The text reflects that these technologies are under development and not yet currently available.
018-18	Kirk Marckwald	California Environmental Associates	[RTP page 42, sentence beginning with "The RTP goods movement strategy ensures..."]: 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. SCAG should also note that the magnitude of the benefits associated with electrification activity would be diminished with the introduction of cleaner locomotives.	Comment noted.
018-19	Kirk Marckwald	California Environmental Associates	[Goods Movement Appendix, page 41, sentence beginning with "Switcher locomotives contribute only a small share..."]: 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	Comment noted.

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			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.	
018-20	Kirk Marckwald	California Environmental Associates	[Goods Movement Appendix, page 35, sentence beginning with "Additionally, significant effort has gone into..."]: 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..."	Comment noted.
018-21	Kirk Marckwald	California Environmental Associates	[Project List Appendix, p. 422]: SCAG identifies $3,771,002,000 for 'goods movement research and development' as 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.	Comment noted. Further clarification has been provided in the text as appropriate.
018-22	Kirk Marckwald	California Environmental Associates	[Passenger Rail Appendix, p. 16, sentence beginning with "In the SCAG Region, this plan will be complicated by drive issues."]: 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.	Comment noted.
018-23	Kirk	California	[Passenger Rail Appendix, p. 21, sentence beginning with	Comment noted.

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	Marckwald	Environmental Associates	"Currently, rail service between downtown LA and the Coachella Valley..."]: 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.	
018-24	Kirk Marckwald	California Environmental Associates	[Passenger Rail Appendix, p. 19, sentence beginning with "Phase II is from Madera to Sacramento..."]: 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 and 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.	Comment noted.
019-01	Tim Carmichael	California Natural Gas Vehicle Coalition	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	Comment noted. While the RTP is required to be based on the vehicle fleet assumptions in ARB's EMFAC model, SCAG has sought to further the implementation of alternative fuels in a number of planning efforts, including applying for and receiving AB 118 funding. As discussed in the Goods Movement section of the RTP, the planning for a zero emission future includes the use of near-term alternative fuels and technologies as bridge to the long-term vision. For example, the SCAG Clean Cities Coalition is currently engaged with three projects that support and encourage the use natural gas as an alternative fuel. The Drayage- Natural Gas Truck Replacement Project involves the replacement of old, heavy-duty diesel drayage trucks with new trucks powered by clean natural gas engines, corresponding

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			the solution for the region's transportation, air quality, and sustainability goals. By focusing almost entirely on "zero-emission" vehicles we believe SCAG is missing the opportunity to develop a strategy that achieves the same benefits in a shorter time frame and for significantly less cost. Over the last two decades we have seen in California that it is very difficult to predict which technology will succeed and even more difficult to say when they will achieve significant market penetration. That is why more agencies and companies are taking a portfolio approach to developing and deploying clean transportation technologies. Natural gas should be an integral part of your Regional Transportation Plan. Natural gas is a very clean fuel, available today for half the price of diesel, and it is abundant in North America. This is why the medium- and heavy-duty vehicle markets in particular are embracing natural gas like never before. Many public and private fleets are investing in natural gas vehicles. Transit agencies, taxi fleets and private companies such as Waste Management; United Parcel Service, AT&T, and Verizon have purchased thousands of small, medium, and large natural gas vehicles. The heavy duty vehicle sector seems to show the greatest promise for natural gas because of the fuel cost savings over diesel and the lack of other viable alternatives to diesel. Recently Swift Transportation, one of the largest trucking companies in the country, said they would be investing heavily in natural gas trucks and could reach 30%-40% penetration in their fleet in 3-4 years.	with the deployment of approximately 180 natural gas trucks. The Liquefied Natural Gas (LNG) - Corridor Expansion Project makes the final connection between the existing public access LNG fuel infrastructure in Southern California and the LNG fuel stations being developed in Utah, providing a 700-mile LNG fueling corridor along one of the nation's most heavily traveled goods movement truck routes between Southern California and Salt Lake City, Utah. And finally, the SANBAG/ Ryder Heavy Duty CNG Truck Replacement Project is funded with $19.2 million to deploy 262 natural gas trucks and construct two fueling stations. There are currently over 130 vehicles deployed, with fueling stations in development. Through Clean Cities, SCAG has shown a commitment to expand the use of a range of alternative fuels.
019-02	Tim Carmichael	California Natural Gas Vehicle Coalition	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,	Comment noted.

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			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.	
020-01	Laura Massie	California Rural Legal Assistance, Inc.	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.	Comment noted.The RTP/SCS is intended to address all the communities in an equitable manner throughout the region.
020-02	Laura Massie	California Rural Legal Assistance, Inc.	We recommend that SCAG add an RTP goal focused on equitable distribution of the benefits and burdens of the RTP/SCS. 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.	Comment noted. The intent of the 2012 RTP/SCS Environmental Justice Analysis is to inform transportation decisions so that low-income and minority communities have ample opportunity to participate in the decision -making process and receive an equitable distribution of benefits and not a disproportionate share of burdens. The 2012 RTP/SCS Environmental Justice Appendix evaluates region-wide impacts on various demographic groups. The results of the specific performance measures demonstrate the regional aggregate benefits various demographic groups are anticipated to experience as a result of the RTP. For a detailed description of the results, please refer to the 2012 RTP/SCS Environmental JusticeAppendix. Project impacts are addressed in detail during subsequent project-level environmental review, based on more precise information regarding project specifications. Regarding the addition of RTP goals, the performance measures portion of the 2012-2035 RTP/SCS has been developed through extensive participation and input from stakeholders in the region, as well as collaboration with other large MPOs in the state. For example, to facilitate the dialogue and development of performance

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				measures for the 2012-2035 RTP/SCS, a Performance Measures Subcommittee was established in May 2011. The Subcommittee met and gathered extensive input from various stakeholders and provided recommendations to the Plans and Programs Technical Advisory Committee for further discussions prior to forwarding to the Policy Committees. As a result of the input process and deliberations, over 20 new performance measures have been added to the RTP/SCS including new categories such location efficiency. In addition, performance measures are also developed in two types based on their intended uses: one for alternatives evaluation and the other for on-going monitoring. Building on the progress, staff will continue investigating additional measures for future plan updates.
020-03	Laura Massie	California Rural Legal Assistance, Inc.	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. 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. See 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.	Comment noted. Chapter 2 of the 2012 RTP/SCS describes a policy for the consideration of open space resources in future planning efforts. This policy involves a strategic planning process engaging CTCs, local governments, resources agencies and others. This process will lead to identification of priority open space resources and opportunities for farmland conservation for future consideration by local agencies. In terms of housing, consideration of the housing needs in rural areas (including farmworker housing) have been addressed through the Regional Housing Needs Assessment methodology process, and resulting draft 2014-2021 RHNA plan. Also, please see the job/housing fit and balance analysis for the inter-county commuters in the Draft Environmental Justice Appendix (pgs. 59-61). SCAG staff used the same Longitudinal Employer-Household Dynamics (LEHD) data as SACOG/UC Davis to conduct the following analysis: (1) convert LEHD data to SCAG TAZ geographies and conduct a correlation analysis between job/worker ratio and commuting distance/time; (2) define both distance and travel based buffers by modes to investigate relationships between job/worker ratio, job pay/worker earning match and commuting distance, travel time and mode usage; (3) confirm the observation and conclusion for inter-county commuters using the LEHD data. The initial result from the item #1 in the methodology described above showed that there is no correlation between job/worker ratio and commuting distance. SCAG anticipates completion of the entire analysis by summer and will share the results and policy

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				implications with academics, MPOs and all interested parties.
020-04	Laura Massie	California Rural Legal Assistance, Inc.	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.	Comment noted. Consideration of the housing needs in rural areas, including farmworkers housing, have been addressed through the Regional Housing Needs Assessment (RHNA) methodology process, and resulting 2014-2021 RHNA plan. A major strategy of the 2012 RTP/SCS is increasing the frequency of transit service and implementing new express bus service in areas underserved by transit, or in areas with latent demand for transit. This goal is challenged however by transit operators operating in a recent environment of reduced funding from the state and local sales tax receipts for operations funding. A major recommendation of the RTP/SCS is to seek new sources of funding for transit services.
020-05	Laura Massie	California Rural Legal Assistance, Inc.	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	Comment noted. Consideration of the housing needs in rural areas, including farmworkers housing, have been addressed through the Regional Housing Needs Assessment (RHNA) methodology process, and resulting 2014-2021 RHNA plan. This process involved regular meetings and outreach efforts to local jurisdictions throughout the region, including those jurisdictions containing farmland.
020-06	Laura Massie	California Rural Legal Assistance, Inc.	· 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	Comment noted.

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			opportunities for expansion and improvement of transit in rural areas.	
020-07	Laura Massie	California Rural Legal Assistance, Inc.	In the interest of mitigating the impacts of gentrification and providing adequate services to agricultural workers and other low-income rural residents, we recommend that certain of the benefits proposed for HQTAs be made more widely available. 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).	Comment noted. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. The trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering.
020-08	Laura Massie	California Rural Legal Assistance, Inc.	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.	Comment noted. HQTAs are defined by state law; however, we have considered and incorporated land use strategies to be considered by local jurisdictions for areas that may eventually become HQTAs.

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			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.	
020-09	Laura Massie	California Rural Legal Assistance, Inc.	We recommend that SCAG take a leadership role in developing non-regressive funding mechanisms for transportation development. 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	Comment noted. One of the key principles we considered as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies is to establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. We recognize that additional work is needed before the mileage-based user fee would become effective. That is why we did not assume it would be implemented prior to 2025. The inclusion of the mileage-based user fee is based on recommendations from two national commissions established by Congress through SAFETEA-LU to establish sustainable transportation revenue sources. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance

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			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.	Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users.
020-10	Laura Massie	California Rural Legal Assistance, Inc.	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. 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	Comment noted. As noted above, the 2012 RTP/SCS Environmental Justice Appendix evaluates region-wide impacts on various demographic groups. We look forward to working with California Rural Legal Assistance, Inc. to provide data that can inform local analyses. It should be noted from the EJ analysis results below that while some locations are identified with emissions increases, this analysis did not account for plan improvements in vehicle technology particularly for truck only corridors. These corridors in the plan are exclusively for zero and near-zero emission vehicles. If these emission improvements had been accounted for we believe the analysis would show no hot spots associated with the plan. As such, the emissions and exposure analysis shown in the EJ Appendix is abundantly conservative and

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			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.	demonstrating worst-case scenario outcomes. Even in the event that hot spots remain after accounting for vehicle technology improvements, there is no reliable way to conclude hot spots would overlay with EJ communities. Neither the available data on emissions nor on distribution of households and population is at a precise enough level of geography to show where they would intersect. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with mitigation identified in the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level.
020-11	Laura Massie	California Rural Legal Assistance, Inc.	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	Comment noted. The Environmental Justice Mitigation Toolbox provides a voluntary set of mitigation measures to be considered by project sponsors for subsequent projects. SCAG will include mitigation strategies for gentrification. We look forward to continuing to work with EJ stakeholders, including the California Rural Legal Assistance, Inc. Additional strategies can be included and analyzed for future projects through their environmental review process, as feasible and appropriate.

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			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.	
020-12	Laura Massie	California Rural Legal Assistance, Inc.	We recommend that SCAG utilize a more broadly accepted measure of economic disadvantage in conducting its environmental justice analysis. 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.	Comment noted. We agree with the comment and general practices by the US Department of Housing and Urban Development (HUD), the California Department of Housing and Community Development (HCD), and other agencies to define poverty or income thresholds based on household size for various social, housing, and welfare programs. However, the Census Bureau does not provide a cross tabulation of household income distribution by household size. While SCAG has developed a "Population Synthesizer" that uses Census and PUMS data to generate household income distribution by household size for each TAZ, the behavior changes are primarily only available at levels associated with household income, not household income distribution by household size. Finally, household income distribution by income quintile is closely correlated to the income categories used for the Regional Housing Needs Assessment (RHNA), which are based on median household income without reference to household size.
020-13	Laura Massie	California Rural Legal Assistance, Inc.	We recommend that SCAG provide more detailed analysis regarding the expected distribution of air quality impacts of the draft RTP/SCS. 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	Comment noted. Data and analysis included in the Environmental Justice Appendix does not account for Plan improvements in vehicle technology particularly for truck only corridors. These corridors in the Plan are exclusively for zero and/or near-zero emission vehicles. Furthermore, the Program Environmental Impact Report (PEIR) accompanying the RTP/SCS includes mitigation measures that would reduce impacts associated with health risk within 500 feet of freeways and high-traffic volume roadways to less than significant. Analysis included in the Appendix also does not account for emissions improvements through the implementation of these mitigation measures. As such, emissions and exposure analysis shown in

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			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.	this Appendix is abundantly conservative and demonstrates worst-case scenario outcomes. If these emissions improvements had been accounted for, we believe the analysis would show little or no areas with worsened emissions ("hot spots") associated with the Plan. Moreover, the currently available data on emissions and on the distribution of households and population is imprecise such that the overlay with emissions and EJ populations will tend to overstate any potential impacts. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with the mitigation identified and to be implemented as part of the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level.
021-01	RJ Cervantes	California Trucking Association	The California Trucking Association is concerned about some of the assumptions made for the "Reasonably Available Revenues" projections. SCAG has identified $219.5 billion in additional revenues that according to the RTP are "... likely to materialize within the RTP time frame" (SCAG 2012 RTP, Page 7). A substantial portion of the $219.5 billion that has been identified in 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, page 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 administered, or what the financial burden would be fore motor carriers and ultimately consumers.	Comment noted. We agree that additional work is needed before the mileage-based user fee would become effective, which is basis for assumption that implementation begins after 2025. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. Numerous studies have been conducted nationally to evaluate mileage-based user fee options. Nevertheless, SCAG concurs that further work would be necessary before implementation. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users.

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021-02	RJ Cervantes	California Trucking Association	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).	Comment noted. The RTP does not assume the implementation of a mileage-based user fee on a local or regional level.
021-03	RJ Cervantes	California Trucking Association	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).	Comment noted. The strategy employed to fund expenditures under a national freight program will be determined by Congress.
021-04	RJ Cervantes	California Trucking Association	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.	Comment noted. The RTP does not assume the implementation of local, regional, or statewide freight fees. Economic impacts upon the SCAG region were critical considerations used in the development of all funding proposals included in the RTP.
021-05	RJ Cervantes	California Trucking Association	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, Page 34, 35). In general, the California Trucking Association opposes tolling as a means for revenue generation due to the high overhead cost 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.	Comment noted. SCAG recognizes the California Trucking Association’s concerns about tolling. However, the RTP assumes revenues generated from toll facilities are restricted to the construction (including paying debt service associated with construction), as well as operation and maintenance of those same facilities and are not eligible for any other facility, project or program.
021-06	RJ Cervantes	California Trucking Association	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 proejcts 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	Comment noted. The toll revenue estimates referenced also includes toll revenue bond proceeds. SCAG recognizes the importance of appropriately structuring toll rates to accommodate phased penetration of advanced technologies as available. As such, SCAG anticipates continued coordination with stakeholders, including the CTA, in realizing the region’s goods movement initiatives.

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			overestimate of zero emission technology penetration rates.	
021-07	RJ Cervantes	California Trucking Association	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.	Comment noted.
021-08	RJ Cervantes	California Trucking Association	SCAG includes $3,771,002,000 for 'goods movement research and development' as a part of the resource constrained plan in measure RRC0703 (2012 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?	Comment noted. SCAG has provided further clarification in the Goods Movement Appendix as suggested.
021-09	RJ Cervantes	California Trucking Association	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 identifying 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.	Comment noted. As part of its Comprehensive Regional Goods Movement Plan and Implementation Strategy, SCAG has worked with regional partners and performed significant analysis aimed at identifying major regional truck bottlenecks and potential solutions/projects to address them. Following the release of the 2012 RTP and the Comprehensive Regional Goods Movement Plan and Implementation Strategy, SCAG will continue to engage appropriate stakeholders in addressing regional truck bottlenecks, including industry representatives such as the California Trucking Association.
021-10	RJ Cervantes	California Trucking Association	The California Trucking Association has not taken a position on whether or not to endorse the East-West Corridor. 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.	Comment noted. Inclusion of the East-West Freight Corridor in the 2012 RTP allows for further work to be conducted on the project through an Environmental Impact Report (EIR). Specific costs, accessibility concerns, designs, and alternative alignments would be identified through this process. Additionally, further discussion of project mitigation concerns would be addressed through upcoming processes. It should be noted, however, that preliminary analysis did consider adjacent land uses and potential right-of-way impacts. SCAG continues to work with affected communities.
021-11	RJ Cervantes	California	The members of the California Trucking Association are	Comment noted. SCAG will continue to work with private

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		Trucking Association	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.	industry, including the California Trucking Association, to identify appropriate and pragmatic solutions to regional emissions concerns.
021-12	RJ Cervantes	California Trucking Association	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 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.	Comment noted. Strategies identified in the Goods Movement Appendix are not intended to serve as mandates. SCAG recognizes and acknowledges the role that the California Air Resources Board (CARB) serves as a rule-making body. SCAG will continue to work with CARB and private industry interests, including the California Trucking Association, to identify appropriate and pragmatic solutions to regional emissions concerns.
021-13	RJ Cervantes	California Trucking Association	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 flets. In fact, there is no 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.	Comment noted. SCAG acknowledges that various technologies are in differing stages of development. The action plan is written to accommodate differences among technologies. For instance, during the 20 year period of phase 4, technologies will be deployed as they meet the criteria for deployment established by regional stakeholders. This was clarified in the Goods Movement Appendix.
021-14	RJ Cervantes	California Trucking Association	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	Comment noted. The 2012 RTP GM environmental strategy includes efforts to gain a better understanding of potential cost differentials for commercial deployment. Further clarification will be made in the RTP concerning funding for research, development and demonstration initiatives.

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			from in order to meet these new goals.	
021-15	RJ Cervantes	California Trucking Association	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.	Comment noted. Further clarification will be made in the RTP concerning funding for research, development and demonstration initiatives.
021-16	RJ Cervantes	California Trucking Association	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.	Comment noted. SCAG concurs that any regional decisions should include the input of all stakeholders. We have clarified the text to strengthen this point.
021-17	RJ Cervantes	California Trucking Association	Furthermore, the final stages in the timeline are 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 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.	Comment noted. Given discussion with our stakeholders and current understanding of technology readiness levels, the timeframes are reasonable. If further study indicates otherwise, SCAG will adjust the timeframe accordingly.
021-18	RJ Cervantes	California Trucking Association	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.	Comment noted. SCAG concurs that any technology selected must meet these objectives. Logistics working groups to be established in Phase 2 of the Action Plan may provide further guidance.
021-19	RJ Cervantes	California Trucking Association	SCAG should clearly state in the RTP that to date, stakeholders have not reached consensus on technologies, timing, or emissions impacts of possible the various options SCAG examined in the Goods Movement Environmental Strategy and Action Plan.	Comment noted. The RTP outlines an action plan to evaluate and better understand these technologies.
021-20	RJ Cervantes	California Trucking Association	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.	Comment noted. The action plan allows for all available technologies to be explored and the most appropriate ones to be selected.
021-21	RJ Cervantes	California Trucking Association	SCAG should not oversell its timeline for zero emission technology penetration rates nor can it predict how this market, just barely in its infancy, will perform in the coming years.	Comment noted. Given discussion with our stakeholders and current understanding of technology readiness levels, the timeframes are reasonable. If further study indicates otherwise,

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			Arbitrary timelines are not a substitute for the kind of analysis that produces good public policy and efficient government expenditure.	SCAG will adjust the timeframe accordingly.
021-22	RJ Cervantes	California Trucking Association	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 authroing of the 2012 RTP.	Comment noted.
021-23	RJ Cervantes	California Trucking Association	I-710/East-West Freight Corridors: 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.	Comment noted. The East-West Freight Corridor offers the potential to incentivize the adoption of zero-emission technologies. Continuing research and collaboration with stakeholders is necessary before development of any full scale implementation policies.
021-24	RJ Cervantes	California Trucking Association	I-710/East-West Freight Corridors: Facility restrictions that prevent National Network terminal access for reasons other than safety are currently prohibited by federal law.	Comment noted. Specific design considerations would be determined as part of an Environmental Impact Report (EIR).
022-01	Ed Amador	Canyon Land Conservation Fund	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 RTP/SCS) states "large-scale acquisition and management of critical habitat to mitigate impacts related to future transportation projects". 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.	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, based on input from a wide variety of stakeholders. Language has been clarified.
023-01	Carlene Matchniff	Centennial California	The application for the proposed sustainable new town of Centennial, located at the intersection of I-5 and SR-138 in North Los Angeles Conty, 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	Comment noted.

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			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 SB375.	
023-02	Carlene Matchniff	Centennial California	SCAG RTP/SCS and PEIR corrections – TAZs 20280.100 and 20281.100, County of Los Angeles: RTP/SCS exhibit 4.13, Land Use Pattern Map SCAG Region 2035, correct growth pattern shading to reflect Centennial.	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
023-03	Carlene Matchniff	Centennial California	SCAG RTP/SCS and PEIR corrections – TAZs 20280.100 and 20281.100, County of Los Angeles: RTP/SCS Exhibit 4.15 Land Use Pattern Map SCAG Region 2035, correct growth pattern shading to reflect Centennial.	Comment noted. SCAG will use updated maps to reflect the comment in the final RTP/SCS.
023-04	Carlene Matchniff	Centennial California	SCAG RTP/SCS and PEIR corrections – TAZs 20280.100 and 20281.100, County of Los Angeles: 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.	Comment noted. Exhibit 4.17 has been to address comment.
023-05	Carlene Matchniff	Centennial California	SCAG RTP/SCS and PEIR corrections – TAZs 20280.100 and 20281.100, County of Los Angeles: 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.	Comment noted. The title was incorrectly labeled as "census tract" instead of TAZ. We have reviewed the data which indicates it was categorized correctly and not in the 901-1,500 category as suggested.
023-06	Carlene Matchniff	Centennial California	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 6.
024-01	Deborah Diep	Center for Demographic Research	1. Incorporate the Orange County Projections-2010 Modified Growth Projections, as adopted by the OCCOG Board of Directors, into all documents, tables, maps, narrative, modeling runs, and PEIR Alternatives (including Alternate C/3/Envision 2) referencing the Orange County growth forecasts consistent with the subregional delegation MOU between OCCOG, OCTA and SCAG. On January 26, 2012, the update to the OCP-2010 dataset, known as OCP-2010 Modified, was officially approved by the OCCOG Board of Directors and is a data amendment to the Orange County Sustainable Communities Strategy. The dataset includes the 2010 Census population and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset. The dataset was	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, and Alternatives (including Alternate C referencing the Orange County growth forecasts).

ID	Name	Affiliation	Comment	Response
			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.	
024-02	Deborah Diep	Center for Demographic Research	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	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.

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			consistent with the RTP/SCS, even if changes are made to the city totals during the appeals, trades, and transfers process.	
024-03	Deborah Diep	Center for Demographic Research	All chapter headings should include the Chapter number on each page for ease of reference.	Comment noted. Chapter numbers have been added.
024-04	Deborah Diep	Center for Demographic Research	Page 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	Comment noted.
024-05	Deborah Diep	Center for Demographic Research	Page 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."	Comment noted. We agree that the region needs to ensure it receives its fair share of transportation funding.
024-06	Deborah Diep	Center for Demographic Research	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?	Comment noted. The additional $0.15 is each state and federal excise gas taxes.
024-07	Deborah Diep	Center for Demographic Research	Page 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."	Comment noted.
024-08	Deborah Diep	Center for Demographic Research	Page 30, right column; page 31, right column; page 73, right column - 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". "The RTP/SCS includes the following actions to address energy uncertainty and reduce the region's contribution to global climate change:" "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	Comment noted. The 2010 California Regional Transportation Plan Guidelines include a recommendation to address adaptation to climate change, California Regional Transportation Plan Guidelines – 6.30, Adaptation of the Regional Transportation System to Climate Change.

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			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…" "Goods movement is also a major source of greenhouse gas (GHG) emissions that contribute to global climate change warming."	
024-09	Deborah Diep	Center for Demographic Research	Page 40, left column - "Strategic investments, put forth by the private sector, that would remove barriers associated with telecommuting are expected…"	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
024-10	Deborah Diep	Center for Demographic Research	Page 42, table 2.2 - 241 toll road completion year is 2030	Comment noted. Table 2.2 has been revised with the correct completion year of 2030.
024-11	Deborah Diep	Center for Demographic Research	Page 50, left column - "scrip"	Comment noted. This term has been added to the glossary.
024-12	Deborah Diep	Center for Demographic Research	Page 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."	Comment noted. The referenced statement on page 54 has been revised to clarify that capacity is exceeded during peak periods.
024-13	Deborah Diep	Center for Demographic Research	Page 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."	Comment noted. Emissions from passenger vehicles, which are the subject of SB 375 and this RTP/SCS, constitute 79% of the transportation sector's greenhouse gas emissions total. (Data source: California Air Resources Board, California Greenhouse Gas Inventory for 2000-2008.)
024-14	Deborah Diep	Center for Demographic Research	Page 80, left column; page 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	Comment noted. The reference to induced growth has been removed in the Final RTP/SCS.

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			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 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 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;…"	
024-15	Deborah Diep	Center for Demographic Research	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	Comment noted. The Growth Forecast Appendix has been updated to accurately reflect the mileage-based user fee proposal.
024-16	Deborah Diep	Center for Demographic Research	Page 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 little raw land available in the region left to accommodate additional growth."	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
024-17	Deborah Diep	Center for	Page 106, last paragraph - Please revise the text in the last	Comment noted. The 2012-2035 RTP/SCS has been updated to

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		Demographic Research	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.”	address comment, as appropriate.
024-18	Deborah Diep	Center for Demographic Research	Page 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…”	Comment noted. The Final Program Environmental Impact Report for the RTP/SCS includes mitigation measures to reduce impacts from stormwater runoff and improve water quality.
024-19	Deborah Diep	Center for Demographic Research	Page 127, right column - “Gentrification”	Comment noted. This term has been added to the glossary.
024-20	Deborah Diep	Center for Demographic Research	Page 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?”	Comment noted. The Final 2012 RTP/SCS has been updated to change "local expectations" to "general plans."
024-21	Deborah Diep	Center for Demographic Research	Page 149, right col - 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 to successfully implement the SCS.”	Comment noted. Clarifying language will be added to the 2012-2035 RTP/SCS, as appropriate.
024-22	Deborah Diep	Center for Demographic Research	Page 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.	Comment noted. This statement refers to SCAG's progress in implementing the RTP/SCS.
024-23	Deborah Diep	Center for Demographic	Page 166, right column - “Greenfield”	Comment noted. This term has been added to the glossary.

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		Research		
024-24	Deborah Diep	Center for Demographic Research	Page 193, right column - RC adopted revised PPP in January 2012	Comment noted. The text has been updated to reflect that the Regional Council adopted Public Participation Plan Amendment No. 3 in January 2012.
024-25	Deborah Diep	Center for Demographic Research	page 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 …”	Comment noted. Text amended to reflect additional SCAG committees that are publicly noticed on Page 194.
024-26	Deborah Diep	Center for Demographic Research	Page 203, right column - "…including Los Angeles Ontario Airport, the March Inland Port…" Should LAX and Ontario airports be named separately?	Comment noted. Los Angeles Ontario Airport refers only to Ontario Airport.
024-27	Deborah Diep	Center for Demographic Research	Page 205, Add "Active transportation" to glossary.	Comment noted. This term has been added to the glossary.
024-28	Deborah Diep	Center for Demographic Research	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.	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into SCAG's final growth forecast dataset for the 2012 RTP/SCS updated all related documents, tables, maps, narrative, modeling runs, and Alternatives (including Alternative C referencing the Orange County growth forecasts).
024-29	Deborah Diep	Center for Demographic Research	Housing Options and Mix: Define Larger-lot single family in text	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-30	Deborah Diep	Center for Demographic Research	Page 53, right column - 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.	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-31	Deborah Diep	Center for Demographic Research	Page 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, [add]except in Gateway and Orange County COG subregions per their SCS delegation agreements[/add]. Future housing market demand is expected to shift significantly to small lot single-family, townhomes and multifamily [delete]hosuing[/delete] housing.”	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-32	Deborah Diep	Center for Demographic	Plan Alternative (B) Define small lot single family in text	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices

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		Research		have been updated to add clarifying language and reflect the comment, as appropriate.
024-33	Deborah Diep	Center for Demographic Research	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."	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-34	Deborah Diep	Center for Demographic Research	"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…"	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-35	Deborah Diep	Center for Demographic Research	What does it mean that TAZ boundaries include city boundaries?	Comment noted. The Tier 2 TAZs referenced on page 72 of the Technical Appendix: SCS Documentation are a set of TAZs with boundaries aligned to city boundaries to ensure that no TAZs are split between multiple cities.
024-36	Deborah Diep	Center for Demographic Research	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.	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-37	Deborah Diep	Center for Demographic Research	Alternatives A & B: Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.	Comment noted. The SCS Background Documentation Appendix was updated as part of the final RTP/SCS to include clarifying language and address comment.
024-38	Deborah Diep	Center for Demographic Research	"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.	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-39	Deborah Diep	Center for Demographic Research	"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)."	Comment noted. The SCS Background Documentation Appendix was updated as part of the final RTP/SCS to include clarifying language and address comment.
024-40	Deborah Diep	Center for Demographic	Alternative A Add statement: Gateway and Orange County COG subregions'	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices

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		Research	local input data will not be changed per their SCS delegation agreements.	have been updated to add clarifying language and reflect the comment, as appropriate.
024-41	Deborah Diep	Center for Demographic Research	Alternative B Add statement: Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements.	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
024-42	Deborah Diep	Center for Demographic Research	Transit Zoning Code Santa Ana 2011 Is this a duplicate of the 2010 Santa Ana project?	Comment noted. The SCS Background Documentation Appendix was updated as part of the final RTP/SCS to include clarifying language and address comment.
025-01	Susan Kline	Citizens Alliance for Property Rights	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 the 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, and 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.	Comment noted. As required by law, SCAG provided advance notice of public workshops and/or hearings on the Draft 2012-2035 RTP/SCS including publication in newspapers throughout the region such as the Ventura County Star to give as many interested parties as possible the opportunity to attend and provide input. As SCAG's main governing body is the Regional Council, comprised of 84 elected officials from SCAG member cities, counties and county transportation commissions who represent the interests within the six-county SCAG region. The Regional Council meet monthly in publicly noticed meetings to discuss and provide input on a variety of matters to address land use, transportation and other long range planning issues.
025-02	Susan Kline	Citizens Alliance for Property Rights	We understand that more of these sessions are planned but that Ventura County has already had its alloted 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 country 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, expand and stack, development in what are	Comment noted.

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			suburban communities?	
025-03	Susan Kline	Citizens Alliance for Property Rights	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. 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.	Comment noted.
026-01	Debra Tash	Citizens Alliance for Property Rights, Ventura County	We know there is NO global warming. That SB 375 is a farce, along with cap and trade and we do not want our tax dollars used any longer for visioning sessions designed to lead us to predetermined outcomes. Nor do we want our fuel taxes diverted to transit projects that are little more than subsidized ridership projects, subsidized with our money. Nor do I want to be packed and stacked into an urban jungle. I worked hard and long to move to a rural environment. We know what you're doing to us. You are advised that there are a growing number of us who will fight you on implementing this every step of the way now.	Comment noted.
027-01	Leland Dolley	City of Alhambra	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 no 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.	Comment noted.
028-01	Sheri Vander Dussen	City of Anaheim	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	Comment noted. All RTP projects must undergo further project-level evaluation, including engineering and environmental studies, before implementation by the lead agency. Changes to

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			RTP. An expansion of toll facilities in the region that is not 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: 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.	project descriptions resulting from these project-level studies may be incorporated into future RTP updates or amendments.
028-02	Sheri Vander Dussen	City of Anaheim	California High-Speed Rail Authority (CHSRA) Project – Staff concurs with the OCTA comments supporting a phased delivery approach, which includes early investment in the existing LOSSAN and Metrolink infrastructure, and indicating it is more prudent to begin implementation at the "bookends" of the system. City staff also submitted a letter to the CHSRA regarding the Draft 2012 Business Plan (see Attachment 1), indicating that implementing this "bookend" approach in the most urbanized regions of the State at the onset of the project is needed to enhance the passenger experience, reduce travel times, improve safety and provide critical connections to the existing passenger rail systems in these regions. It would also maximize the investment of State and Federal funds so that these critical improvements will be implemented.	Comment noted. The RTP supports early investments to the LOSSAN and Metrolink networks.
028-03	Sheri Vander Dussen	City of Anaheim	Sustainable Communities Strategy – Under SB 375 and only within the SCAG region, subregional councils of government were allowed to prepare subregional SCSs that SCAG is then required to incorporate into the regional SCS. In Orange County, OCCOG and OCTA developed a countywide SCS (OC SCS) to be included as the County's contribution to the SCAG regional SCS. SCAG notes in the RTP/SCS that it has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional 2012 RTP/SCS in their entirety, and are recommended for adoption by the SCAG Regional Council as part of the Final 2012 RTP/SCS.As such, SCAG anticipates that the subregional SCS policies included in the regional plan would be implemented in the respective sub-region after the plan is adopted. The Final 2012 RTP/SCS addresses the requested language change.

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			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: 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."	
028-04	Sheri Vander Dussen	City of Anaheim	References to the RTP inducing growth – Several sections of the RTP/SCS state that it has the ability to affect the distribution of growth as well as induce growth (see page 80 under Population and Housing as an example). This is inconsistent with the "bottoms-up" approach SCAG undertook in the development of the documents wherein SCAG staff stated that they would accept and use growth forecast data provided by local jurisdictions. The RTP/SCS is intended to incorporate the planned land use pattern that is expected to accommodate the projected future growth of this region as well as the planned transportation system that supports that growth. Therefore, growth is not induced, it is planned for. The document inaccurately implies a lack of coordination between land use and transportation entities. Request: 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.	Comment noted. The reference to induced growth has been removed in the Final RTP/SCS.
028-05	Sheri Vander Dussen	City of Anaheim	Growth Forecast and Mapping 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. 24. To ensure	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into SCAG's final growth forecast dataset for the 2012 RTP/SCS, and updated all related documents, tables, maps, narrative, modeling runs, and Alternatives (including Alternative C referencing the Orange County growth forecasts). Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.

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			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.	
028-06	Sheri Vander Dussen	City of Anaheim	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 8.
029-01	Laura Pierce	City of Brea	Brea values the dialog we have historically enjoyed with SCAG on regional issues. We have a solid track record and commitment to providing land use and transportation policies which are consistent with the existing and planned regional transportation system. We appreciate that the draft RTP/SCS encompasses three principals: Mobility, Economy, and Sustainability, that collectively work to significantly improve existing transportation and air quality challenges for the region. The inclusion of active transportation goals and funding at the regional level is one which Brea is extremely interested in for our "Tracks at Brea" trail program to increase non-motorized transportation in our community. The plan also identifies the future bus rapid transit connection planned near the Brea Mall that will connect 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 RTP/SCS	Comment noted.
029-02	Laura Pierce	City of Brea	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?	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.
029-03	Laura Pierce	City of Brea	Can you explain further how SCAG envisions directing new housing and employment growth to High Quality Transit Areas 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?	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority. The subregional SCS documents submitted by GCCOG and OCCOG are

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				incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region.
029-04	Laura Pierce	City of Brea	Public health is a concern for 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?	Comment noted. SCAG prepared additional analysis to highlight the emissions exposure in areas within 500 feet of freeways and high volume roads. It should be noted that the level of emissions near these facilities is higher than in the region as a whole. In 2035 these areas still will have higher emissions than the region as a whole. However, while regional emissions overall decrease, the rate of decrease between now and 2035 near freeways and high volume roads is even greater. The RTP/SCS does result in an increase in population in these locations, and as such health risk is higher for these individuals than if they were not in the buffer area. As such, subsequent project level analysis and mitigation should be cognizant of on-going health concerns. However, the plan as a whole shows benefits for emissions exposure and decreased levels of risk in areas near freeways.
029-05	Laura Pierce	City of Brea	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 discussions with SCAG on this implementation as specific projects are submitted in the future.	Comment noted. SCAG is working to secure incentives for local governments for SCS implementation including additional funding for SCAG's Local Sustainability Planning Assistance Program (e.g., Compass Blueprint, Green Region) and Strategic Growth Council grants.
029-06	Laura Pierce	City of Brea	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?	Comment noted. The determination of the RTP's compliance with fiscal constraint, as part of meeting air quality conformity requirements are made at the time of plan adoption or amendment. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four

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				years.
029-07	Laura Pierce	City of Brea	On page 149, it is stated that "The following tables list specific implementation strategies that local government, 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".	Comment noted. Clarifying language will be added to the 2012-2035 RTP/SCS, as appropriate.
029-08	Laura Pierce	City of Brea	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 not include an accurate map (enclosed) for Orange County which should be revised in the final document for Regional Council review and approval.	Comment noted. SCAG has corrected any inconsistencies that were found in the Land Use Pattern Maps for Orange County between the plan document and the technical reports, resulting in the re-designation of the urban village in Northeastern Brea (see the updated Exhibit 4.17 on page 145). Regarding your concern about the Olinda Landfill site, SCAG would like to assure you that the adopted growth projection for Orange County is consistent with the Orange County Council of Governments (OCCOG) subregional SCS. Our underlying data provided by Orange County indicate no housing growth in the Olinda Landfill area during the 2012 RTP/SCS planning years.
029-09	Laura Pierce	City of Brea	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 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 delegations between OCTA, OCCOG, and SCAG. All documents, tables, maps, narratives,	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution. SCAG has incorporated the OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, Alternatives (including Alternate C referencing the Orange County growth forecasts).

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			modeling runs, PEIR alternatives (including Alternative C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.	
029-10	Laura Pierce	City of Brea	We suggest that the final document should reference the chapter numbers of each section of the plan in the header to assist the reader in cross-referencing the document.	Comment noted. Chapter numbers have been added.
029-11	Laura Pierce	City of Brea	We suggest adding to the glossary a definition for Active Transportation.	Comment noted. This term has been added to the glossary.
029-12	Laura Pierce	City of Brea	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 9.
030-01	Michael Forbes	City of Burbank	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 constrains 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 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 believed 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.	Comment noted. For past RTPs, SCAG conducted physical capacity analyses for Bob Hope and Ontario airports, which are capacity-constrained airports that do not have legally-enforceable constraints. This process first identified the capacity factor at each airport that is the overriding factor in ultimately limiting demand-serving capacity. For Ontario it is the two-runway complex, and for Bob Hope (BUR) it is the 14 terminal gates/aircraft parking positions. For BUR, the analysis then estimated the future passenger throughput of the 14 gates considering a variety of factors including future fleet mix, aircraft load factors, airport hours of operation, and gate turnover time for carriers serving the airport (the discount carriers serving BUR have significantly higher gate turnover times than the average). The 9.4 MAP capacity figure estimated by this analysis was compared to an unconstrained forecast for BUR to confirm that the unconstrained forecast was higher. Documentation of this capacity analysis for BUR was provided to Bob Hope airport staff and to Burbank elected officials for both the 2001 and 2004 RTPs. The 2035 air passenger forecasts in the Final 2012 RTP/SCS will be caveated to reflect that the 78.9 MAP Settlement Agreement constraint at LAX expires in 2020, and that any new information provided to SCAG by an individual airport authority on allowable legal or capacity constraints at their airports will be reflected in future aviation demand forecast developed by SCAG (such as for the 2016 RTP). The forecasts will also be caveated to indicate that any relaxation of the 78.9 MAP forecast constraint at LAX could significantly impact the passenger demand forecast at BUR, and that Bob Hope Airport management believes that the 2035 forecast for BUR should be less than 8 MAP.

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030-02	Michael Forbes	City of Burbank	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 adjusments 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 Rial system.	Comment noted. We agree that additional work is needed before the mileage-based user fee would become effective, which is the basis for assumption that implementation begins after 2025. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. We also recognize that the future cannot be known with certainty and we therefore made reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and documented in the RTP to ensure transparency. As we gain more insight into the future and the reasonableness of our assumptions, we will update the financial plan accordingly through amendments and/or Plan subsequent updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
030-03	Michael Forbes	City of Burbank	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	Comment noted. The 2012 RTP/SCS advocates seeking new funding sources to increase transit services.

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			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.	
030-04	Michael Forbes	City of Burbank	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)	Comment noted. The regional transit connection between the Red Line and the Gold Line in Pasadena is in the Strategic Plan, and the extension of the Red Line to Burbank airport is in the Constrained Plan. The 2012 RTP/SCS advocates for new revenue sources to fund additional transit services should funding become available.
030-05	Michael Forbes	City of Burbank	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 of the local network.	Comment noted. As discussed in the RTP, the Southern California MOU in development between the CHSRA, MPOs and county transportation commissions aims to improve interconnectivity as well as speed and service between the rail systems in our region. Improving connectivity between rail and local transit systems is also a major RTP transit goal.
030-06	Michael Forbes	City of Burbank	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 most remain at the local level. The RTP/SCS provides blanket policies that apply	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG

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			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.	altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.
031-01	Mike Kellison	City of Chino	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. 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 ID 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.	Comment noted. The East-West Freight Corridor alignment identified as part of the 2012 RTP would be further analyzed in more detail through a project-level Environmental Impact Report (EIR) and associated alternatives analysis as part of that EIR. The EIR would address the concerns presented by the City of Chino regarding potential impacts on identified current and future projects. SCAG intends to continue to work closely with its partners and industry stakeholders, including the City of Chino, on next steps related to the East-West Freight Corridor to ensure that the proposed project is a collaborative effort that fully considers stakeholder input and concerns.
031-02	Mike Kellison	City of Chino	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 10.
032-01	Michael Fleager	City of Chino Hills	We have reviewed the draft Regional Transportation Plan (RTP) for the 2012-2035 planning period. The City of Chino Hills	Comment noted.

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			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.	
033-01	Mark Tomich	City of Colton	Ms. Margaret Lin: Please see attached comments from the City of Colton regarding local arterial improvement strategies and commuter rail station feasibility study. Mark Tomich Development Services Director City of Colton	Comment noted. Regarding the feasibility of a commuter rail station in Colton, decisions regarding station locations are generally under the purview of the county transportation commission, and SCAG would work with SANBAG if appropriate and necessary, should a feasibility study be undertaken. Regarding the arterial improvement strategies, we have addressed all modification requests to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
034-01	Doug Bailey	City of Cypress	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.	Comment noted. Please see specific responses to the OCCOG comments.
035-01	James DeStefano	City of Diamond Bar	While the overall goal to reduce both the congestion impacts and environmental impacts is admirable, we continue to have	Comment noted. Inclusion of the East-West Freight Corridor in the 2012 RTP/SCS allows for further work to be conducted

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			significant concerns regarding the component of the 2012 RTP to designate only the Pomona (SR 60) Freeway as and 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 businesses of many cities, including Diamond Bar.	through a project-level Environmental Impact Report (EIR). Specific costs, accessibility concerns, designs, and alternative alignments would be identified through this process. Additionally, further discussion of project mitigation concerns would be addressed through upcoming processes. It should be noted, however, that preliminary analysis did consider adjacent land uses and potential right-of-way impacts. SCAG will continue to work with affected communities, including Diamond Bar, on this project.
035-02	James DeStefano	City of Diamond Bar	We believe it is pre-mature to identify the SR 60 and the SJC Wash alignments as a viable Corridor project in the 2012 RTP. We have the following specific concerns: 1. No studies have been conducted regarding the localized air, noise, vibration, or visual impacts 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 acquistion). 2. 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. 3. 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 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?	Comment noted. The specific impacts of the East-West Freight Corridor project, including localized air, noise, vibration, or visual impacts, would be determined through the completion of a project-level Environmental Impact Report (EIR). Numerous potential alignments along alternative freeway corridors were considered and analyzed including the I-210, SR-60, I-10, and SR-91. This was in addition to other alignments (e.g., the UPRR corridor as noted above, hybrid alignments). Right-of-way acquisition was only one criteria considered in identification of the proposed alignment of the East-West Freight Corridor. Among other criteria considered were proximity to manufacturing facilities, warehousing, and other goods movement dependent industries, potential impacts to local residents and businesses, and geographic limitations. Zero-emissions technologies currently exist (e.g., catenary systems for passenger rail) and it is a reasonable assumption that such technologies would be adopted for facilities such as the East-West Freight Corridor. SCAG acknowledges the need for continuing analyses and dialogue with stakeholders.
035-03	James DeStefano	City of Diamond Bar	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 Corridor in the financially-	Comment noted. SCAG maintains that sufficient level of analyses have been undertaken to date to warrant inclusion of the East-West Freight Corridor in the RTP. Analysis of the freight corridor concept is expected to continue through the

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			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 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, CTC: 1. 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." 2. Page 100 - "If FHWA and FTA find and RTP or FTIP to be fiscally constrained and the planned/programmed projects are included based on outdated or invalide cost estimates, then FHWA/FTA will not make funding or environmental approval actions for the listed project(s)....." 3. 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."	completion of a project-level Environmental Impact Report (EIR). To date, cost analysis has been undertaken evaluating right-of-way constraints/impacts and other mitigation needs. In accordance with federal requirements, all costs identified in the 2012 RTP (including costs for the freight corridor) is reflected in Year of Expenditure (YOE or nominal dollars), using and 3.2 percent annual inflation factor.
035-04	James DeStefano	City of Diamond Bar	Attempts to focus truck lanes on the SR-60 and the SJC 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 a proposal. We respectfully request the 2012 RTP and PEIR to consider all possible routes to serve the	Comment noted. Analysis completed for the East-West Freight Corridor indicate that areas along the proposed corridor would benefit from reduced congestion, reduced emissions as a result of the use of zero-emission vehicles, and the preservation of jobs in adjacent areas where significant numbers of freight industries and employers are located. Potential alternative alignments of the East-West Freight Corridor would be determined through an alternatives analysis completed as part of a project-level Environmental Impact Report (EIR), including scoping workshops with affected communities, including

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			ever-increasing demands of the est-west goods movement between I-710 and I-15. It is unreasonable to designate the SR-60 and SJC as the singular east-west route.	Diamond Bar.
035-05	James DeStefano	City of Diamond Bar	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 11.
036-01	Scott Ochoa	City of Glendale	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.	Comment noted. The 2012 RTP/SCS advocates seeking new funding in order to increase transit services.
036-02	Scott Ochoa	City of Glendale	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.	Comment noted. The extension of the Red Line to Bob Hope airport is in the Constrained Plan, and the East-West connector between North Hollywood and Pasadena is in the Strategic Plan.
036-03	Scott Ochoa	City of Glendale	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.	Comment noted. The 2012 RTP/SCS supports early investments to our region's existing rail services in advance of the California High-Speed Train becoming operational; and such investments are included in the Constrained and Strategic Plans.
036-04	Scott Ochoa	City of Glendale	The RTP only allocates a little more than 1% of the funding to Active Transportation. We believe that SCAG should consider	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation

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			increasing the funding for Active Transportation to between 5%-8% of the total funding in the RTP.	investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
036-05	Scott Ochoa	City of Glendale	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 ratio 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	Comment noted. a. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. As is indicated in the plan, regional and local agencies are not assumed to enact the mileage-based user fee. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. c. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments. Please note that the RTP/SCS meets the greenhouse gas emission reduction targets established pursuant to SB 375. d. The

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			projects.	investments in the RTP, including all revenue sources, provide a return of $2.90 for every dollar invested. We recognize that the future cannot be known with certainty and we therefore made reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and documented in the RTP to ensure transparency. As we gain more insight into the future and the reasonableness of our assumptions, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
036-06	Scott Ochoa	City of Glendale	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 the 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 continue effort and expenditure of tax-payer onies 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.	Comment noted. The 710 project is included in the voter-approved Measure R sales tax measure and in Metro's Long Range Transportation Plan, as well as in previous SCAG RTPs. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
036-07	Scott Ochoa	City of Glendale	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 12.
037-01	Deanna Elliano	City of Hemet	Two Major Highway projects of major interest to the City of	Comment noted. The referenced Exhibit 2.1 has been revised to

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			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: Exhibit 2.1 Major Highway Improvements 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. 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.	include the Mid County Parkway and SR-79 Realignment, while Table 2.2 has been revised to replace CETAP Intercounty Corridor A with the SR-79 realignment and I-215 widening from Scott to Nuevo.
037-02	Deanna Elliano	City of Hemet	In the Highways and Arterials report, Exhibit 4 and Exhibit 9 should be corrected to include the SR79 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.	Comment noted. Exhibits 4 and 6 of the Highways and Arterials Appendix has been revised to include SR-79 Realignment and the Mid County Parkway.
037-03	Deanna Elliano	City of Hemet	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.	Comment noted. We have addressed all modification requests to the Project List as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
037-04	Deanna Elliano	City of Hemet	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	Comment noted. The location sitings of commuter rail stations for the extension of the Perris Valley Line are determined by the Riverside County Transportation Commission.

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			village surrounding a future station in Downtown Hemet. We request consideration of adding a station to this project in Downtown Hemet. In addition, as noted in the RTP (ID 3CR0702) a station is proposed at the Hemet Ryan Airport. These locations immediately around the airport are constrained by the 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 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. The city would like to co-locate a bus transit center with the Hemet Downtown Metrolink station. FTIP ID RIV 041030 on page 75 of the FTIP Project List indicates the location of the transit center at the 700 Scaramella Circle. This is the site of the RTA bus yard, and not appropriate for passenger use. Please reference "in the vicinity of Sate Street and Devonshire Ave" 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.	
037-05	Deanna Elliano	City of Hemet	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 on-going 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. 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 maps in	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			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 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.	
037-06	Deanna Elliano	City of Hemet	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.	Comment noted.
037-07	Deanna Elliano	City of Hemet	Per the comments noted above for the locations of Metrolink and Transit Station in the City pf 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 provide in the SCS.	Comment noted.
038-01	John Jaquess	City of Highland	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.	Comment noted. SCAG has incorporated the revised SANBAG dataset into the final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, and Alternatives.
039-01	Sean Joyce	City of Irvine	The City of Irvine concurs with the Orange County Council of Governments (OCCOG) and Orange County Transportation Authoirty 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	Comment noted.

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			and OCTA letters and to act upon any changes advocated by OCCOG, of which the City is a member agency.	
039-02	Sean Joyce	City of Irvine	SCAG's adoption of the growth forecast numbers should be at the county level, consistent with past RTPs, not at a smaller level of geography such as city, census tract, or traffic analysis zone level. The growth projections provided to SCAG represent the best available information from local jurisdictions, the business community, and landowners. However, as time passes, what is feasible for any given project can change. A county level of geography accommodates internal adjustments to changing conditions, without compromising the integrity of the overall growth projections. Approving the growth projections at any lower level of geography, such as the city level, would be challenged with continual revisions and shifts to the total number of housing, population, and employment within a city, among cities, and county would also limit local jurisdictional control and create inflexibility in a regional planning document.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
039-03	Sean Joyce	City of Irvine	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.	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices has been updated to include clarifying language.
039-04	Sean Joyce	City of Irvine	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	Comment noted. This project is included in the Project List under FTIP #ORA000118.

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			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.	
039-05	Sean Joyce	City of Irvine	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 growth forecasts) should be updated with Orange County Projections 2010 Modified Growth Projections (OP-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 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.	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, Alternatives (including Alternative C referencing the Orange County growth forecasts).
039-06	Sean Joyce	City of Irvine	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 14.
040-01	Ann Wilson	City of La Canada Flintridge	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," must "address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance". 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.	Comment noted. However, SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal requirements. Under 23 CFR 450.322, an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained."
040-02	Ann Wilson	City of La Canada Flintridge	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	Comment noted. A benefit-cost analysis was prepared for the RTP. The investments in the RTP provide a return of $2.90 for every dollar invested. An analysis of the economic impacts of the RTP is also provided in the Economic and Job Creation Analysis of the 2012 RTP/SCS Appendix. The majority of transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and

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			process and model in its language.	other previous commitments.
040-03	Ann Wilson	City of La Canada Flintridge	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 segment 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.	Comment noted. The distribution of funding for different transportation investments in the RTP is a result of local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.
040-04	Ann Wilson	City of La Canada Flintridge	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 would 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 decisions 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.	Comment noted. References to the “SR-710 Gap Closure” have been revised to “SR-710 Transportation Improvement Options”.
040-05	Ann Wilson	City of La Canada Flintridge	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	Comment noted. Increase in total VMT in 2035 over the current condition is primarily due to estimated increase of 4 million people over the plan period. However, VMT on a per capita basis will decrease over this period once the plan is fully implemented. While the Plan does include some needed

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			conditions." (SCAG RTP/SCS PEIR p. 3.2-25). Specifically, decreasing VMT is the goal of SB 375 and should also be the goal of the RTP/SCS. This increase in VMT is the Plan's reliance on 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 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 alternative 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.	highway improvements, including the SR-710 Transportation Improvement Options project, there is no evidence that these improvements would contribute to the total VMT increase in any discernible way. The 2012 RTP identifies a multi-modal strategy that incorporates transit, highway, and active transportation strategies as well as demand management and congestion pricing strategies to achieve overall improved system performance and reduction in GHG targets required under SB 375.
040-06	Ann Wilson	City of La Canada Flintridge	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 current conducting the EIR for the project and is the lead agency. 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	Comment noted. A project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.

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			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 multimodal 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.	
040-07	Ann Wilson	City of La Canada Flintridge	The SR-710 "Gap Closure 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 Kreck 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 respirator 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 in a strong predictor of "debilitating lung disease and mortality in later life." The City of La Canada 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 Canada Flintridge, Pasadena, La Crescenta and Glendale, and that 2,500 of these would be heavy duty trucks in peak hours. It can also be concluded from that study that 75% of local streets	Comment noted. A project specific environmental analysis is underway by the lead agency, which will consider project impacts including environmental and traffic and mobility impacts, and identify mitigation measures as required. Upon the completion of this effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.

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			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 regional 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. 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.	
040-08	Ann Wilson	City of La Canada Flintridge	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 shoudl 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 other citied.	Comment noted.
040-09	Ann Wilson	City of La Canada Flintridge	The City of La Canada 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.	Comment noted. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
040-10	Ann Wilson	City of La Canada Flintridge	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 15.
041-01	Carlos Jaramillo	City of La Habra	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	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA

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			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.	allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
041-02	Carlos Jaramillo	City of La Habra	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	Comment noted. SCAG will incorporate "OCP-2010 Modified" dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS.

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			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.	
041-03	Carlos Jaramillo	City of La Habra	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.	Comment noted. The final RTP/SCS has been updated to include clarifying language.
041-04	Carlos Jaramillo	City of La Habra	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 [delete] can and should undertake in order [/delete] to successfully implement the SCS."	Comment noted. The final RTP/SCS has been updated to clarify that actions and strategies proposed in Chapter 4 represent a menu of options that local jurisdictions may choose to implement at their discretion.
041-05	Carlos Jaramillo	City of La Habra	Please provide SCAG analysis supporting the strategies in the Draft RTP/SCS Chapter 4.	Comment noted. The SCS Background Documentation Appendix contains analysis that supports the strategies in the RTP/SCS Chapter 4.
041-06	Carlos Jaramillo	City of La Habra	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.	Comment noted. The final RTP/SCS has been updated to clarify that actions and strategies proposed in Chapter 4 represent a menu of options that local jurisdictions maymay choose to implement at their discretion.
041-07	Carlos Jaramillo	City of La Habra	Issue: OC SCS Strategies: There are strategies in the Orange County SCS that are not included in the regional SCS. Similarly,	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS

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			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.	in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide.
041-08	Carlos Jaramillo	City of La Habra	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.	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide.
041-09	Carlos Jaramillo	City of La Habra	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.	Comment noted. Chapter 3 provides the financial plan of the 2012 RTP/SCS.
041-10	Carlos Jaramillo	City of La Habra	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.	Comment noted. The RTP supports increased investment in transit service in to markets where transit service will be well utilized and cost effective.
041-11	Carlos Jaramillo	City of La Habra	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.	Comment noted. The CA High-Speed Train alternative alignments are in the environmental planning phase and the locally preferred alternative has not yet been selected.
041-12	Carlos Jaramillo	City of La Habra	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.	Comment noted. SCAG is currently engaged in a collaborative process to prepare Southern California for the forecasted influx of Plug-In Electric Vehicles (PEV), which will reduce air pollution, address AB 32 and SB 375, and attract green businesses to Southern California. SCAG recognizes that a regional planning perspective is necessary to adequately address PEV Readiness. In order to better understand the on-going and planned efforts

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				in the region, SCAG has coordinated stakeholder meetings with utilities, subregional councils of government, academia, jurisdictions and other key regional partners. SCAG has also included PEV related actions and strategies in the Draft RTP/SCS that would support and expand this effort. In June 2011, SCAG, in conjunction with our regional partners applied for two PEV planning grants and was successful in both applications. The first grant, awarded by the U.S. Department of Energy (DOE) has as its primary purpose the development of a Regional PEV Readiness Plan for Southern California. The South Coast Air Quality Management District (SCAQMD) submitted the statewide application in partnership with SCAG, the Bay Area Air Quality Management District, the Plug-In Electric Vehicle Collaborative, and Clean Cities Coalitions in California. This grant awarded $1 million to PEV Readiness efforts statewide, with $300,000 going to SCAG. The second successful grant application was awarded by the California Energy Commission (CEC) and was the result of a collaborative effort between SCAG and SCAQMD in partnership with SCE, the Western Riverside Council of Governments (WRCOG), and South Bay Cities Council of Governments (SBCCOG). This grant has been funded for $200,000. The purpose of the project is to develop two complementary subregional plans in collaboration with WRCOG and SBCCOG. These subregional plans will serve as models for other subregions as they begin to develop their own PEV Readiness Plans. SCAG will continue to work with our regional partners on this new planning effort and will pursue outreach efforts to additional stakeholders as the process evolves.
041-13	Carlos Jaramillo	City of La Habra	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.	Comment noted.
041-14	Carlos Jaramillo	City of La Habra	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	Comment noted. A detailed discussion of funding sources can be found in Chapter 3 of the RTP, Financial Plan. Specifically, please see Table 3.4.1 Core and Reasonably Available Revenue Projections—Local Revenue Sources (in Nominal Dollars, Billions).

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			improvements will be funded.	
041-15	Carlos Jaramillo	City of La Habra	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.	Comment noted. The RTP supports increased transit service in areas currently underserved by transit in order to provide an incentive to single-occupant vehicle travel and to reduce vehicle miles travelled. The RTP also recommends finding new revenues to fund transit.
041-16	Carlos Jaramillo	City of La Habra	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.	Comment noted.
041-17	Carlos Jaramillo	City of La Habra	A discussion of Measure M in Orange County should be included on page 133.	Comment noted. Chapter 3: Financial Plan and Transportation Finance Appendixe have a more detailed description of all revenue sources including Measure M.
041-18	Carlos Jaramillo	City of La Habra	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.	Comment noted.
041-19	Carlos Jaramillo	City of La Habra	Page 139... The plan also suggests improved traffic signal synchronization projects but how those improvements will be funded are not discussed.	Comment noted. Chapter 3 provides the financial plan of the 2012 RTP/SCS, in which funding for all modes of transportation are discussed, including funding for ITS strategies such as traffic signal synchronization.
041-20	Carlos Jaramillo	City of La Habra	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.	Comment noted.
041-21	Carlos Jaramillo	City of 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.	Comment noted. Funds have been made available through the California Energy Commission and the U.S. Department of Energy to assist the region in its conversion to electric or other zero and near zero transportation technologies. SCAG's Clean Cities Coalition will be involved in outreach as these funds are expended and will contact local governments for input. We encourage you to sign up as a Clean Cities stakeholder and follow SCAG's electric vehicle infrastructure planning process to learn about future funding opportunities.

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041-22	Carlos Jaramillo	City of La Habra	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."	Comment noted. The 2012 RTP/SCS has been updated to address comment, as appropriate.
041-23	Carlos Jaramillo	City of La Habra	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.	Comment noted. In regard to the mitigation measures, SCAG does not intend to dictate mitigation to jurisdictions. As such, SCAG addressed these concerns within the 2012-2035 RTP/SCS PEIR revision approach, as presented at the Joint Regional Council and Policy Committees Workshop on the PEIR on February 21, 2012. The reference to induced growth has been removed in the Final RTP/SCS.
041-24	Carlos Jaramillo	City of La Habra	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.	Comment noted.
041-25	Carlos Jaramillo	City of La Habra	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.	Comment noted. The 55-day formal public review and comment period for the Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy concluded on February 14, 2012, and complies with federal and state requirements for gathering public comments for such documents. During the last two years, SCAG staff engaged in extensive consultation with the regional stakeholders, including cities, counties, transportation commissions, air districts, and other representatives from the private and public sectors, in the development of the draft RTP/SCS documents.
041-26	Carlos Jaramillo	City of La Habra	1) RTP General. All chapter headings should include the Chapter number on each page for ease of reference.	Comment noted. Chapter numbers have been added to the RTP/SCS.

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041-27	Carlos Jaramillo	City of La Habra	2) RTP p. 1, left col – "The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act." 3) RTP p. 4, right col - "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."	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
041-28	Carlos Jaramillo	City of La Habra	2) RTP p. 1, left col – "The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act.	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
041-29	Carlos Jaramillo	City of La Habra	3) RTP p. 4, right col - "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."	Comment noted. The additional $0.15 is each state and federal excise gas taxes.
041-30	Carlos Jaramillo	City of La Habra	5) RTP p. 40, left col - "Strategic investments, put forth by the private sector, that would remove barriers associated with telecommuting are expected…"	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
041-31	Carlos Jaramillo	City of La Habra	6) RTP p. 42, Table 2.2 - 241 toll road completion year is 2030	Comment noted. Table 2.2 has been revised with the correct completion year of 2030.
041-32	Carlos Jaramillo	City of La Habra	7) RTP p. 50, left col – "scrip", Please define in text and add to glossary.	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
041-33	Carlos Jaramillo	City of La Habra	8) RTP p. 54, right col - "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."	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
041-34	Carlos Jaramillo	City of La Habra	9) RTP p. 70, 78 -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 mitigation measures obligate regional agencies and project developers to undertake more strategies, programs and mandates beyond those	Comment noted. Demonstrating its proactive compliance with the SB 375 requirements, the 2012 RTP/SCS achieves the 2020 8% reduction target and exceeds the 2035 13% GHG reduction target. It is not SCAG's intent to obligate local governments to undertake more strategies, programs and mandates beyond those included in the OC SCS. Edits regarding the percentage of GHG emissions from the transportation sector will be made in the final RTP/SCS. In regard to the mitigation measures, SCAG does not intend to dictate mitigation to jurisdictions. Clarifying

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			included in the OC SCS. 10) RTP p. 78, right col - 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) RTP p. 80, left col - Statements are made, such as, "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 attract more of the regional population growth in certain areas of the region. This means that 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. Transportation projects in the RTP also have the potential to divide established communities, primarily through acquisition of rights-of-way."	language has been added to the final RTP/SCS, including the removal of specific references to induced growth.
041-35	Carlos Jaramillo	City of La Habra	RTP p. 82, right col - 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 include	Comment noted. Clarifying language has been added to the final RTP/SCS, including the removal of specific references to induced growth.

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			increased impervious surfaces;…”	
041-36	Carlos Jaramillo	City of La Habra	12) RTP Ch. 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) RTP p. 95, Table 3.3 – Delete “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.”	Comment noted. The determination of the RTP’s compliance with fiscal constraint as part of meeting air quality conformity requirements, are made at the time of plan adoption or amendment. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG’s Technical Advisory Committee and Policy Committees and are well documented in the RTP/SCS. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years. The Growth Forecast Appendix has been updated to accurately reflect the mileage-based user fee proposal.
041-37	Carlos Jaramillo	City of La Habra	14) RTP p. 105, right col - “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 raw land available in the region.” 16) p. 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) p. 110, right col - “Municipal water and sewer systems, for example, ensure clean water. At the same time, 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	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate. Underlying socioeconomic data can be found in the final Growth Forecast Appendix.

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			yet engineered and hardened. Many strategies…" 18) p. 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, graphics and maps that provide the detail that confirm this consistency.	
041-38	Carlos Jaramillo	City of La Habra	19) p. 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) p. 127, right col – "Gentrification", add to glossary 21) p. 128, left col - "Thus, this adjustment allowed the land use pattern to conform more closely to local general plans, while reducing the amount of vehicle miles traveled." Whose/What are "local expectations?" 22) p. 149, right col - 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	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. Land use inputs from GCCOG and OCCOG were not changed per their subregional SCS agreements. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to include clarifying language and reflect the comment, as appropriate.

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			would help to successfully implement the SCS." 23) p. 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) p. 166, right col – "Greenfield", add to glossary	
041-39	Carlos Jaramillo	City of La Habra	25) p. 194, right col - "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 …"	Comment noted. Text was amended to reflect additional SCAG committees that are publicly noticed on Page 194.
041-40	Carlos Jaramillo	City of La Habra	26) p. 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.	Comment noted. This text refers specifically to goods movement. However, any plans for a zero-emission freight rail system could apply to the region's passenger rail system in the case of shared tracks. Further, electrified high speed rail is discussed elsewhere in the RTP.
041-41	Carlos Jaramillo	City of La Habra	27) p. 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.	Comment noted. The subregional SCS document submitted by OCCOG is incorporated into the regional RTP/SCS in its entirety, and as such, the policies and projects included are part of the regional plan for implementation in the sub-region.
041-42	Carlos Jaramillo	City of La Habra	28) p. 207 - Strategic Finance. Please explain what will happen if reasonably foreseeable revenue sources of approximately $200 million do not become available?	Comment noted. The determination of the RTP's compliance with fiscal constraint as part of air quality conformity requirements are made at the time of plan adoption or amendment. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP/SCS. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent updates as appropriate. At a minimum, a new or updated RTP is adopted every four years.
041-43	Carlos	City of La	29) p. 205 – "Active transportation", add to glossary	Comment noted. This term has been added to the glossary.

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	Jaramillo	Habra		
041-44	Carlos Jaramillo	City of La Habra	Growth Forecast Appendix, p. 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.	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into SCAG's final growth forecast dataset for the 2012 RTP/SCS updated all related documents, tables, maps, narrative, modeling runs, and Alternatives (including Alternative C referencing the Orange County growth forecasts).
041-45	Carlos Jaramillo	City of La Habra	PM Appendix p. 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. PM Appendix p. 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." PM Appendix p. 1, col 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.	Comment noted. The Performance Measures are meant to describe and demonstrate quantitatively the potential benefits and impacts of the actions proposed in the 2012 RTP/SCS at a regional scale, including meeting the specific performance requirement under SB 375 to reduce the GHG emissions on a per capita basis by 8% in 2020 and 13% in 2035 over the 2005 condition. The proposed performance measures are consistent with the best practices and comply with both state and federal requirements. The Performance Measures Appendix has been revised to state that the RTP/SCS performance measures are not required for use at the subregional or project-specific level.
041-46	Carlos Jaramillo	City of La Habra	[PM Appendix] p. 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. p. 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. p. 23, Table 10 - NHTS Model	Comment noted. 1) The two gravity-model type of accessibility indicators, with travel time as an impedance value, are calculated: auto accessibility is used as an independent variable in the VMT model, and local bus accessibility is used in the mode choice model. Zone-to-zone travel time used in the accessibility calculation reflects the traffic condition of the transportation network, which is very useful to this production-based modeling analysis. 2) To estimate model coefficients, the number of household vehicle is from NHTS data (actual). When using the model to estimate the number of trips or VMT, the number of vehicles is estimated from the "Auto Ownership Model" (predicted). 3) It is calculated for each observation and averaged the result. 4) The 2035 Plan Scenario was tested for the 2012 RTP.

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			Documentation Report. Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample? p. 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.	
041-47	Carlos Jaramillo	City of La Habra	Finance Appendix – 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?	Comment noted. The majority of funds identified as reasonable available revenues (excluding core revenues), are not assumed to be available until the latter years of the RTP. The determination of the RTP's compliance with fiscal constraint as part of meeting air quality conformity requirements, are made at the time of plan adoption or amendment. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
041-48	Carlos Jaramillo	City of La Habra	[SCS Background Appendix] p. 53, right col - Housing Options and Mix: Define Larger-lot single family in text. p. 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. p. 71, right col - "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 housing." ["housing" misspelled] p. 71, right col - Plan Alternative (B). Define small lot single family in text. p. 71, right col - 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	Comment noted. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.

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			or employment growth." p. 72, left col - "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…" p. 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. p. 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. p. 75, right col - "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.	
041-49	Carlos Jaramillo	City of La Habra	[SCS Background Appendix] p. 79, right col - "Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be unchanged and integrated into the alternatives (with possible revisions for Alternative C only)." p. 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? p. 80 - Alternative A. Add statement: "Gateway and Orange County COG subregions' local input data will not be changed per their SCS delegation agreements." p. 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	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. Land use inputs from GCCOG and OCCOG were not changed per their subregional SCS agreements. The final SCS Background Documentation and Subregional Sustainable Communities Strategies Appendix were updated to include clarifying language.

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			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." p. 115, left col - Transit Zoning Code Santa Ana 2011. Is this a duplicate of the 2010 Santa Ana project?	
041-50	Carlos Jaramillo	City of La Habra	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 16.
042-01	Gayle Ackerman	City of Lake Forest	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.	Comment noted. The 55-day formal review and comment period for the Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy concluded on February 14, 2012, and this process complied with applicable federal and state requirements. During the last two years, SCAG staff engaged in extensive outreach activities and consultation with the regional stakeholders, including cities, counties, transportation commissions, air districts, and other representatives from the private and public sectors, in the development of the draft RTP/SCS documents. SCAG apologizes that the comment period could not be extended primarily due to schedule constraints dictated by deadlines for SCAG to meet federal transportation conformity requirements.
042-02	Gayle Ackerman	City of Lake Forest	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.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
042-03	Gayle Ackerman	City of Lake Forest	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	Comment noted. SCAGhas incorporated the "OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS, and updated all related documents, tables, maps, narrative, modeling runs, Alternatives (including Alternative C, referencing the Orange County growth forecasts).

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			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 Alternative C/3/Envision 2), and datasets should be updated with the OCP-2010 Modified numbers.	
042-04	Gayle Ackerman	City of Lake Forest	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 17.
043-01	Miles Mitchell	City of Los Angeles	LADOT has prepared the attached list of approximately 90 projects that the City is requesting to be added to the Strategic Plan.	Comment noted. Projects provided by LADOT to SCAG for the Strategic Plan have been added to the Strategic Plan.
043-02	Miles Mitchell	City of Los Angeles	[LADOT] The City wishes to emphasize that, for future RTP/SCS project lists, the City, Metro and SCAG need to continue the effort to improve connectivity between various transit systems. For example, in South Los Angeles County, there needs to be greater emphasis placed on the development of feeder systems to connect and support the Blue, Green, Expo and Crenshaw lines. These systems would include, but not be limited to, expanded Bus Rapid Transit and improved bicycle and pedestrian linkages.	Comment noted. The RTP recommends improved connectivity between different transit modes, as well as expanded BRT service and Active Transportation investments, in order to reduce vehicle miles travelled.
043-03	Miles Mitchell	City of Los Angeles	LADOT wishes to draw attention to both the Los Angeles Bicycle Plan and Mobility Hubs initiatives (a First Mile/Last Mile strategy). These efforts support both the Active Transportation and Transportation Demand Management strategies of the RTP. The RTP includes numerous references to expanded bicycle facilities and other First Mile/Last Mile strategies, and therefore these strategies are presumably included with likely funding in the Financially Constrained Plan. However, to the extent these initiatives are not included in the Constrained Plan they should be added to the Strategic Plan.	Comment noted.
043-04	Miles Mitchell	City of Los Angeles	[Dept. of City Planning] (RE: Exhibits 2.5 and 4.11, Regional Bicycle Network) It appears that the City's recently adopted 2010 Bicycle Plan for 1,684 miles of bike facilities across Los Angeles is not included in this Exhibit. Some segments of this bicycle network are in development and have been identified for funding, and are therefore included in the 2012 RTP list of transportation investments. Including the full proposed bicycle network will support the long-term commitment to pursue resources for development of the network. The City	Comment noted. The Proposed Regional Bikeway Network map has been revised to include the bikeways identified in the City of Los Angeles' 2010 Bicycle Plan.

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			recommends that the SCS include the bicycle facilities identified in the City's 2010 Bicycle Plan.	
043-05	Miles Mitchell	City of Los Angeles	[LADOT] Because the SCS will emphasize increased development within ½ mile of either a "major transit stop or high-quality transit corridor" there may be an increased need for transportation infrastructure in these areas. LADOT is concerned that CEQA streamlining could allow development to occur with impacts on transportation infrastructure. LADOT staff has consulted with staff of DCP and the City Attorney regarding the impact of CEQA streamlining on the City's development review process. Input received from these sources indicates that although CEQA streamlining of various types will occur following adoption of the RTP/SCS, the City may retain some degree of "discretionary approval" authority over development projects that are subject to CEQA streamlining. LADOT believes that this area deserves further study. This is a complex and important subject, and the City should carefully evaluate and prepare for the impact of CEQA streamlining following adoption of the RTP/SCS.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.
043-06	Miles Mitchell	City of Los Angeles	[Dept. of City Planning] Under SB375, the requirement to prepare a SCS was coupled with incentives to encourage sustainable development and implementation of an SCS. As any proposed development is considered by local jurisdictions, this CEQA relief is at the discretion of local jurisdictions. However, as written, the RTP/SCS can be construed to indicate that CEQA relief is part of the land use plan and is available by right to all development that meets the qualifications. The City recommends that the SCS better reflect the opportunity for CEQA streamlining incentives through the following changes: 1) In the discussion of the mandate to prepare an SCS (p. 106), amend last sentence of the second to last paragraph to read: "In addition, some projects consistent with the SCS may be eligible for streamlined environmental review." 2) In Exhibits 4.1, 4.2, and 4.3, remove the depiction of Transit Priority Project (TPP) areas. Depicting this in these exhibits is confusing because a TPP is not defined. Depiction of TPP boundaries detracts from the purpose of the exhibits, which is to show where growth is directed over the planning period of the RTP/SCS. 3) In discussion of TAZs and development types (p. 122) remove discussion regarding CEQA streamlining and adequacy of TAZ-	Comment noted. The SCS Background Documentation Appendix has been updated to include clarifying language and address the comment, as appropriate.

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			level land use information. This point is difficult to understand as presented and requires further explanation. It pertains to incentives available to jurisdictions/developers, not to the modeling analysis. It detracts from the purpose of the section. Delete the sentence beginning with, "Additionally, SB375 offers local governments potential ..." and delete the following sentence, "SCAG suggests that utilizing community types..." 4) A reference to the summary of the CEQA incentive (p. 148) should be included under the section "RTP/SCS Next Steps" and the summary should be moved to follow this because the incentive can be used to encourage/facilitate implementation of the SCS and is therefore better understood as a next step. The summary should include a discussion regarding a jurisdiction's discretion in certifying the environmental review for a project, regardless of eligibility for streamlining. 5) In the SCS Background Documentation, a summary of the CEQA exemption (p. 84) should include description of a jurisdiction's discretion in certifying the environmental review for a project, regardless of eligibility for streamlining.	
043-07	Miles Mitchell	City of Los Angeles	[Dept. of City Planning] The HQTA boundaries encompass all neighborhoods within a 1/2 mile radius and appear the indicate that growth will take place throughout the area, including low density single-family neighborhoods and industrial district. In fact, the City is far more discriminating, and adopted land use plans reflect carefully studies areas where growth can be absorbed. Generally, land use changes to accommodate growth are typically at transit stops and on parcels fronting transit corridors. Single-family neighborhoods are generally preserved. The City recommends that additional explanation be included on pages 112-113 to better describe where growth is accommodated. [Append to the discussion of HQTAs under the first bullet "Development Location (Dispersed Growth vs. Focused Development)" the following text]: "Within these boundaries, growth within a given jurisdiction is consistent with the integrated growth forecast for that jurisdiction and is distributed according to the jurisdiction's land use plans. Thus, while areas within 1/2 mile of a transit stop or corridor are walkable in relation to transit, not all such areas are targeted for growth and/or land use changes."	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS.
043-08	Miles Mitchell	City of Los	[Dept. of City Planning] Exhibit 4.5, Urban Centers SCAG Region,	Comment noted. Exhibit 4.5 shows the general locations of

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		Angeles	depicts the locations of urbanized core areas, or core centers. However, these urban centers do not appear to align with the urban centers identified in Exhibit 4.15 for areas within the City of Los Angeles. The City recommends that the relationship between Exhibit 4.5 and Exhibit 4.15 be clearly described. If the two exhibits are intended to illustrate the same urbanized areas, staff recommends that the color scheme used in Exhibit 4.15 also be used in Exhibit 4.5.	urban centers within the SCAG region. These are areas where strategies such as compact community design, mixed-use development, redevelopment of aging retail areas, greater housing variety, and additional transit service are considered as more likely to succeed. Exhibit 4.15 uses Community Types identifies the RTP/SCS overall forecasted land use pattern for Los Angeles County. Urban centers may include a range of these Community Types.
043-09	Miles Mitchell	City of Los Angeles	[Dept. of City Planning] The SCS projects higher density in urban centers, and anticipates growth in transit rich areas throughout the City of Los Angeles in order to demonstrate a decrease in GHG emissions by 2035. Staff compared the city's General Plan Land Use to the SCS Land Use Pattern Maps and has found that in general the SCS is consistent with the City's land use density and land use designations. However, in closely examining 76 rail and bus transit station areas, staff has found instances of inflated density, which innaccurately reflects the General Plan distribution of growth. Exhibit 21 Land Use Pattern Map 2035 identifies urban centers with densities that are not consistent with community plans for these areas. Such centers would have residential densities ranging from 82 to 120 housing units or more per acre. This density is typical in the Central City and some adjacent neighborhoods, and is proposed for Warner Center, but is generally not appropriate throughout the rest of the city. In addition, the following issues were found in multiple station areas. Multi-Family neighborhoods - densities up to 178, 145, or 61 units/acre that are too high for may sites; densities too high in areas adjacent to single-family neighborhoods. Single-Family neighborhoods - increase in density in strictly single-family areas that are stable and where no growth is anticipated; parcels and corridors in HPOZ reflect density designations that are too high, these areas are stable with no projected change; residential uses reflected as commercial. Commercial corridors - density projections are too high. Industrial land use - industrial areas that are to be preserved as industrial are inaccurately represented as commercial or retail; industrial areas that show residential designations are an inaccurate reflection as these sites are preserved. Public facilities - land use changes at school sites that are not projected to change; high residential densities or commercial	Comment noted. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.

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			uses projected on public facilities such as along freeways, county jail, open space. The City recommends that more appropriate representations of land use around station areas be made, which can be identified on detailed annotation maps of the station areas and provided under separate cover.	
043-10	Miles Mitchell	City of Los Angeles	[LAWA] Use of Airport Funds - LAWA's first priority is to maintain safe and efficient airports. All airports have a tremendous demand for capital improvements. As such, most airports depend on financial support from the FAA via grant funds for eligible construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property. Using airport funds for non-airport functions violates federal law and jeopardizes the airport's ability to receive federal grants. Nevertheless, LAWA seeks to partner with SCAG to find solutions to support ground access improvements to airports, other primary transportation facilities, and "secondary" airports in the region. Use of Airport Express Buses - the RTP includes an "action step" which would plan and promote a regional system of airport express buses, modeled in part on the FlyAway service currently operating at LAX. LAWA agrees that express buses are a promising solution to certain ground access problems. However, it has been LAWA's experience that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service. LAWA invites SCAG to continue examining ways to bring similar projects to other airports, but cautions that these services, by themselves, may not be effective in increasing passenger demand at "secondary" airports. Aviation activity constraints - LAWA agrees that the aviation activity constraints in the region, and potential dispersion of that activity at other airports, should be re-examined in subsequent regional plans. 2011 Air Passenger Survey - the 2006 LAX Air Passenger Survey was used to create several data points within this section of the RTP. LAWA is hoping to unveil the results of its 2011 Air Passenger Survey in February of this year. SCAG should consider updating its Appendix with this new data as it finalizes the RTP. LAWA will	Comment noted. SCAG recognizes that the federal government currently places strict limitations on the use of airport revenues for off-airport purposes. To address this issue, SCAG has adopted regional aviation policies in support of new legislation that allows for more flexible use of airport revenues for off-airport ground access projects when requested by airport operators, and this policy continues to be advanced in the 2012 RTP/SCS. SCAG welcomes continued partnership and coordination with LAWA in developing and implementing regional airport ground access strategies. We agree that express buses are most effective at airports with high passenger demand, as discussed in the Airport Ground Access Report in the 2012 RTP/SCS Aviation Technical Appendices, and that new “FlyAways” serving airports other than LAX are not likely to have a significant impact on future regional air passenger distributions. SCAG looks forward to working with LAWA in identifying sites for viable new “FlyAways,” and re-examining aviation activity constraints at LAWA-operated airports for SCAG’s next (2016) Regional Transportation Plan. Due to time and resources constraints SCAG is unable to incorporate data from LAWA’s recently released 2011 LAX Air Passenger Survey into the 2012 RTP/SCS Airport Ground Access Report in the Aviation Appendix. However, this new data will be used in any future updates to this report.

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			post the results of this survey on our website (www.lawa.org) once the report is completed.	
043-11	Miles Mitchell	City of Los Angeles	[LAWA] SCAG has reported a number of vehicle trips to LAX under existing conditions and future 2035 forecast, citing the LAX Master Plan EIR/EIS. However, the numbers reported do not correspond to data that LAWA has previously reported or used in any environmental analysis. LAWA requests clarification on these data points. LAWA recommends the following changes to Tables 4-6 and 4-7. In Table 4-6, the following projects should be included in the list of projects completed since the project notice of preparation in 2008 (footnote 1): Douglas St, La Cienega Blvd, Lincoln Blvd (all), Nash St, Sepulveda Blvd (both), the I-105 westbound off-ramp at Sepulveda Blvd, and the I-405 at SR-90. Two other projects on Table 4-6, Arbor Vitae St, and the I-405 from I-10 to SR-101, are under construction as of January 2012. In Table 4-7, Project LAX-19, which includes Lincoln Blvd improvements, has already been completed. LAWA recommends that SCAG include in the RTP a portion of the project referred to as LAX-10, widening Aviation Blvd from Century Blvd to Manhattan Beach Blvd to 3 lanes in each direction.	Comment noted. The vehicle trip estimates from the LAX Master Plan EIR/EIS were not used directly in the Draft 2012 RTP/SCS Airport Ground Access Report since they were prepared for different years (2005 and 2015) than those used in the report, and were generally expressed in terms of peak hour traffic volumes rather than daily traffic volumes. The vehicle trips shown in the Airport Ground Access Report were estimated using data and factors that were derived from a variety of sources, including the LAX Master Plan EIR/EIS, the 2006 LAX air passenger survey, and reports issues by the Aviation Cooperative Research Program and Transit Cooperative Research Program. In general, traffic data from the LAX master plan was used to approximate a trip generation rate for the airport that was applied to the forecast passenger increase to project future traffic volumes. Table 3-3 in the Airport Ground Access Report has been clarified to reflect these distinctions. The Airport Ground Access Report in the Aviation Technical Appendixof the 2012 RTP/SCS has been revised to incorporate the recommended changes to LAX ground access projects listed in Table 4-6 and Table 4-7.
044-01	Brenda Wisneski	City of Newport Beach	It is requested that the adoption of the growth forecast numbers by the Regional Council andlor Joint Policy Committee be at the county level, consistent with past RTPs. Planning documents need to be flexible . As time passes, what is possible and feasible for any given project changes. These changes can be due to market conditions, new information or data, or infrastructure available that may shift when and where development is possible. Smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell would limit jurisdictional control over land use. The OCCOG Board approved the update to the OCP-2010 dataset used in the OC SCS. OCP-2010 Modified was officially approved by the OCCOG Board on January 26, 2012, and is a data amendment to the OC SCS. The dataset includes the 2010 Census popu lation and housing data, along with the 2010 EDD Benchmark data, consistent with SCAG's updated growth forecast dataset The dataset was provided to SCAG staff in December 2011, which should be incorporated into the 2012 RTP/SCS, PEIR, and	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution. SCAG will incorporate OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS/PEIR. The incorporation of the OCP-2010 Modified might need to update all related documents, tables, maps, narrative, modeling runs, PEIR Alternatives (including Alternate C/3/Envision 2 referencing the Orange County growth forecasts).

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			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-201 0 Modified numbers.	
044-02	Brenda Wisneski	City of Newport Beach	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 20.
045-01	Chris Hughes	City of Ontario	We understand and have supported SCAG's efforts to incorporate city growth plans into the regional planning process. However, as in the past, we believe that the RTP/SCS growth forecasts should be adopted at the county level, not the city or sub-city (TAZ) level. This would allow more flexibility in dealing with inevitable changes in socio/economic trends within the region and subregion.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
045-02	Chris Hughes	City of Ontario	We have questions regarding the use of TAZ level data in the CEQA Incentive program discussed on page 148. We are not convinced that the land use scenarios and development types created by SCAG for each TAZ are accurate. We would also like to clarify that the only use of TAZ level data to be used by SCAG in the future would be for the CEQA Incentive program and not for growth projections.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
045-03	Chris Hughes	City of Ontario	In a separate letter (dated February 13, 2012, from Jerry Blum, Planning Director) we requested that two important projects for Ontario be included in the 2012 RTP. These projects were requested via SANBAG and SCAG's consultant previously.	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
045-04	Chris Hughes	City of Ontario	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 21.
046-01	Jason Samonte	City of Oxnard	Thank you for the opportunity to review the 2012-2035 Regional Transportation Plan (RTP). The document presents a comprehensive plan to accommodate future transportation needs for the Southern California Region utilizing limited resources. For the Ventura County Region the projections indicate increasing congestion along the 101 Freeway Corridor between Los Angeles and Ventura Counties. The surveys also indicate that a majority of commuter in the Ventura County Region commute alone. If this trend continues, it stands to reason that an increase in population will be accompanied by an increase of drive alone commuters. I support the investment in	Comment noted.

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			transit and commuter rail services to encourage an alternate form of transportation between Los Angeles and Ventura Counties.	
046-02	Jason Samonte	City of Oxnard	As the economy expands in the region, there will be added demand to transport goods by rail. This added demand will result in lengthened cargo trains that will increase delay where streets intersect railroad tracks at-grade. Additional money should be allocated for grade separations along primary arterial roads. Grade separating will improve safety for vehicles, bicycles and pedestrians as well as eliminate the need for the train to blow their horn. It is doubtful that we can ever expand the freeways sufficiently to fully accommodate the Regions vehicle demands.	Comment noted. The amount of goods moved by train over the RTP horizon are expected to increase. This could result in increased delays, emissions, and safety concerns at road/railway crossings. SCAG supports effort by local County Transportation Commissions, and agencies such as the Alameda Corridor East (ACE) Construction Authority, to complete regional grade separations. Regional grade separations identified by these partners are included in the SCAG 2012 RTP project list.
047-01	Michael Behen	City of Palmdale	The City worked diligently with SCAG to develop the growth projections for population, housing and employment data for the 2008 (existing), 2020, and 2035 years. These growth projections represent what we feel is a realistic growth rate projection based upon the information available to us as well as our understanding of City and Antelope Valley growth related issues. Further, these numbers also reflect our draft RHNA allocations. Therefore, it is our position that the adoption of the growth forecast numbers continue to be done at the local level and not at a larger subregional or county level.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
047-02	Michael Behen	City of Palmdale	The RTP does not mention the Palmdale Energy Action Plan (PEAP) and we feel that there should be some type of reference and/or acknowledgement of the City's efforts to address GHG reduction. This issue was mentioned at several sub-regional coordinator meetings in which SCAG indicated that they would include this in the document but did not.	Comment noted. SCAG commends the City of Palmdale for their forward-thinking Energy Action Plan and has referenced it in Chapter 2 of the Final RTP/SCS.
047-03	Michael Behen	City of Palmdale	The RTP/SCS identifies strategies to reduce greenhouse gas emissions from cars and light duty trucks. The City has concerns related to the implementation of these proposed strategies. These strategies should not be required individually but with several discretionary options made available to the City to satisfy GHG emission reduction goals.	Comment noted. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, local jurisdictions maintain local land use authority.
047-04	Michael Behen	City of Palmdale	The SED disaggregation at the TIER II TAZ level does not correlate with the City's land use plan. Provide clarification on methodology used. How will our city be able to make the necessary consistency findings for projects that are eligible for CEQA streamlining benefits if the modeling results do not match	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			our locally adopted General plan? this shall be clarified.	
047-05	Michael Behen	City of Palmdale	Page 156 of Aviation and Airport Group Access supplemental document should be updated to reflect the reflect the California High Speed Rial Authority's January 12, 2012, decision to discontinue the study of the Grapevie alignment and to continue the final study of an Antelope Valley Alignment and station in the City of Palmdale.	Comment noted. The Airport Ground Access Report in the Aviation Technical Appendices of the Draft 2012 RTP/SCS has been revised to incorporate this new information on the proposed alignments for the California High-Speed Rail Project.
047-06	Michael Behen	City of Palmdale	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 95.
048-01	Bill Bogaard	City of Pasadena	The City of Pasadena supports the policies included in the RTP to encourage the the expansion of local transit service to serve as feeder systems to the regional transit to serve as feeder systems to the regional transit network. However, the RTP does not address the limited funding resources that local agencies have in providing these important services. We would like the RTP to identify additional funding resources to expand local transit services and include policies that expand the availability of funding for local transit providers.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.
048-02	Bill Bogaard	City of Pasadena	I believe you are aware of the active role Pasadena has played over a long period regarding any freeway connection that traverses our community. The issueof the 710 North extension, albeit being a tunnel alternative as opposed to a surface freeway, continues to be a sensitve topic amoung our elected officials, neighborhood groups, and city residents. We request that the RTP recognize the on-going environmental study for this facility and not presuppose the ongoing studies by defining the route for the 710 north extension project.	Comment noted. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
048-03	Bill Bogaard	City of Pasadena	The City of Pasadena would like the regional transit connection between the North Hollywood Red Line /Orange Line Station and the Gold Line in Pasadena via Burbank and Glendale included in the RTP. This is an important transit project for our sub-region, and should be included in the RTP and should be considered for implementation using reasonably available funding sources described in the RTP Financial Plan.	Comment noted. This transit project is included in the RTP's Strategic Plan as project ID #S1120099.
049-01	Arturo Cervantes	City of Pico Rivera	East-West Freight Corridor Program: The City supports the proposal for the East-West Freight Corridor Program. The City agrees the Southern California regional freeway system represents one of the highest volume goods movement corridors in the United States and is of major importance to the	Comment noted. SCAG's analysis to date suggests that the identified alignment would provide an opportunity to move the facility away from neighborhoods and closer to industrial uses versus other routes that were considered. It is important to note that the alignment identified as part of the 2012 RTP

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			distribution of consumer goods. We understand major freeways such as Interstate 605 and State Route 60, are impacted by high volumes of truck traffic and truck volumes that will increase through 2035 by 260% or more. For this reason, the City supports the East-West Freight Corridor Program as the solution address the goods movement in the region. We recognize that the RTP/SCS identifies and recommends a corridor concept that would connect to the north end of the I-710 freight corridor, roughly parallel the Union Pacific Railroad (Los Angeles Subdivision) before finally following a route adjacent to SR-60 east of SR-57. This grade-separated concept considers the use of the Union Pacific Railroad Corridor (UPRR Corridor), between I-710 and I-605, through the City of Pico Rivera. The RTP/SCS further states that the potential use of two non-roadway routes provides an opportunity to move the facility away from neighborhoods and closer to the industrial activities that it would serve. This could not be further from the truth, especially when considering the existing land use along said Corridor is residential. The statement that this alignment provides an opportunity to move the facility away from neighborhoods is erroneous as it relates to the City of Pico Rivera. The proposed dedicated truck lanes, forecasted to carry from 58,000 to 70,000 trucks per day, will result in the rerouting of truck traffic from major freeways through the City of Pico Rivera. In effect, the program would build a new freeway through Pico Rivera dedicated to truck traffic (truck dedicated freeway). The City of Pico Rivera opposes any corridor alignment that includes the segment of the UPRR Corridor between the 710 Freeway and the 605 Freeway. This proposal splits the City in half, requires significant residential, industrial, and commercial property acquisition, and has aesthetic impacts unacceptable to the City. This proposal is unacceptable to the city and we oppose it. The City respectfully requests that potential routes for the East-West Freight Corridor be limited to freeway routes only, and the non freeway routes not be further considered. The subject UPRR Corridor segment can be supplanted with the segment of the State Route 60, between the Interstate 710 and the Interstate 605. SCAG should effectively evaluate the connection between the two freeways to make this option feasible. As stated in the enclosed City Council Resolution approved on	would be analyzed in greater detail through an Environmental Impact Report (EIR). Appropriate detailed analysis that would be completed through the EIR would identify potential impacts of the East-West Freight Corridor on circulation patterns on adjacent local facilities. Placing the East-West Freight Corridor concept in the 2012 RTP allows for further study. SCAG intends to continue to work closely with its partners, especially cities such as Pico Rivera.

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			October 25, 2011, the City of Pico Rivera supports the East-West Freight Corridor Program and supports alternative regional goods movement plans that equitably distribute truck traffic between the Interstate 710 and Interstate 15 through the expansions of the existing freeway system. However, for the reasons stated above, the City of Pico Rivera opposes any SCAG proposal for dedicated truck lanes along the Union Pacific Railroad Corridor, in the City of Pico Rivera.	
049-02	Arturo Cervantes	City of Pico Rivera	California High Speed Rail: The RTP/SCS includes options for high speed rail. The City is concerned about the feasibility of such a project in California. We understand that discussions are ongoing among SCAG, the County Transportation Commissions, and the California High Speed Rail Authority regarding levels of available funding for rail infrastructure improvements within the SCAG region. We look forward to further details about the specific investments that will be made in Southern California's rail infrastructure under the RTP/SCS, particularly those that affect the City of Pico Rivera. At this time, the RTP/SCS proposes three Passenger Rail strategies that will provide additional travel options for long-distance travel within the region and to neighboring regions. The City understands these improvements to be to the Los Angeles-San Diego (LOSSAN) Corridor, improvements to the existing Metrolink system, and the implementation of Phase I of the California High-Speed Train project. The City would support such improvements only if to enhance the existing rail system through Pico Rivera, and not add supplementary rail lines within new corridors that would require significant residential/industrial/commercial property acquisition.	Comment noted.
049-03	Arturo Cervantes	City of Pico Rivera	Goldline Eastside Transit Corridor Phase II: The RTP/SCS estimates that the Goldline Eastside Transit Corridor will be completed by 2035. However, the need for mass transit in the eastside area is greatly underestimated and should be included as a high priority project. The Goldline Eastside Transit Corridor was also included as a project in the regional SCS as it will greatly help to reduce the effects of greenhouse gases. As such, the City of Pico Rivera requests that the Goldline Eastside Transit Corridor be a high priority project both in the RTP/SCS and in the bienniel 2011 Federal Transportation Improvement (FTIP) update.	Comment noted. Project completion dates are supplied for the 2012 RTP/SCS by project sponsors or the relevant county transportation commission. In this case, the completion of the Eastside Transit Corridor Phase 2 (1TR0704 – LA0G626) was supplied by the Los Angeles County Metropolitan Transportation Authority (Metro). SCAG will continue to work with Metro to amend any final alignment decision, as per the yet to be selected Locally Preferred Alternative, and any findings from the yet forthcoming final environmental documents into the RTP.

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049-04	Arturo Cervantes	City of Pico Rivera	Financial Plan: Table 3.3, New Revenue Sources and Innovative Financing Strategies of the RTP/SCS Financial Plan lists Mileage-Based User Fee as a replacement to the gasoline tax. This is a new fee that may affect lower-income residents within the Gateway Council of Governments region. Please advise how the fees would be implemented and how they may affect lower income residents.	Comment noted. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users.
050-01	Nate Farnsworth	City of Rancho Santa Margarita	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.	Comment noted. The 55-day formal review and comment period for the Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy concluded on February 14, 2012, and this process complied with applicable federal and state requirements. During the last two years, SCAG staff engaged in extensive outreach activities and consultation with the regional stakeholders, including cities, counties, transportation commissions, air districts, and other representatives from the private and public sectors, in the development of the draft RTP/SCS documents. SCAG apologizes that the comment period could not be extended primarily due to schedule constraints dictated by deadlines for SCAG to meet federal transportation conformity requirements.
050-02	Nate Farnsworth	City of Rancho Santa Margarita	It is requested that the adoption of the growth forecast numbers by the Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs. Planning documents need to be flexible. As time passes, what is possible and feasible for any given project changes. These changes can be due to market conditions, new information or data, or infrastructure available that may shift when and where	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.

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			development ins possible. Smaller geographic levels, such as at the subregional, city, census tract, TAZ, parcel, or grid cell would limit jurisdictional control over land use.	
050-03	Nate Farnsworth	City of Rancho Santa Margarita	Please define what is meant by various terms in the RTP/SCS and draft PEIR. Because mitigation measures are intended to be implementable and measurable in order to evaluate the effectiveness of the measures, it is important for the measures to clearly indicate what actions are expected to be undertaken. These include, but are not limited to: o Urban Growth Boundary o Parking Cash Out o References to benchmarks o Smart growth principles o SCRIP o Active Transportation o Gentrification o Greenfield o Open space	Comment noted. Several of these terms have been added to the glossary.
050-04	Nate Farnsworth	City of Rancho Santa Margarita	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 delegations 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.	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS updated all related documents, tables, maps, narrative, modeling runs, Alternatives (including Alternate C referencing the Orange County growth forecasts).
050-05	Nate Farnsworth	City of Rancho Santa Margarita	Finally, the City has participated in providing comments through the OCCOG Technical Advisory Committee (TAC). Rather than incorporating those comments into this comment letter verbatim, the City requests that the comments provided by the OCCOG TAC be incorporated into the City's comments by reference.	Comment noted.
050-06	Nate Farnsworth	City of Rancho Santa Margarita	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 23.
051-01	Steve Hayes	City of Riverside	1. The SCS includes projected land use patterns for 2035 using High Quality Transportation Corridors. In the City of Riverside, this includes Bus Rapid Transit (BRT) and Metrolink Lines similar to the City's General Plan 2025. However, the land use patterns in the SCS were applied at the Transportation Analysis Zones	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			(TAZ), which incorporate large areas of land that may contain drastically varying land uses or developable land. Using this map for consistency with the City's General Plan 2025 would be very problematic. For instance, maintaining land use consistency between the General Plan and the prescribed TAZ map along the Alessandro Boulevard BRT corridor would force the City to direct growth to areas such as the Sycamore Canyon Wilderness Park (a natural open space conserved by the County Multiple Species Habitat Conservation Plan) and along hillsides and arroyos, which have already been developed to their maximum density based upon their natural characteristics. The area near the La Sierra Metrolink Station is another part of the City where increasing density using the prescribed TAZ map would result in directing density into a protected area. The City's Greenbelt, a protected agricultural area which lacks the infrastructure to support the proposed density, encompasses a large section of the City in this area and would be impacted by the proposed growth.	
051-02	Steve Hayes	City of Riverside	Generally, the SCS map is in conformance with the City's General Plan 2025 and its intent. However, using TAZ's rather than parcels and following the logistics of the City's natural characteristics causes some problems in creating General Plan consistency.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
051-03	Steve Hayes	City of Riverside	Page 148 of the RTP/SCS describes how consistency within a TAZ can be averaged. However, the projected growth in some of the TAZ's located within the City of Riverside is not feasible due to various constraints, including a lack of infrastructure, habitat conservation efforts, and topography. The City's General Plan accounts for these constraints and is consistent with the overall intent of the SCS, however it directs density to where it is appropriate along these same corridors. This is consistent with Smart Growth principles, which advocate for protecting sensitive open space areas and placing density in urban areas where infrastructure already exists.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
051-04	Steve Hayes	City of Riverside	The City aims to be consistent with the SCS but cannot achieve this at the TAZ level. Is there another option? Especially since the City's General Plan 2025 currently meets the overall intent of the SCS, but does so based upon the City's natural characteristics.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
051-05	Steve Hayes	City of	Socio-economic Data for Riverside County was revised by SCAG	Comment noted. SCAG has incorporated the revised WRCOG

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		Riverside	based upon the 2010 Census. These revisions were presented to the Executive Committee of WRCOG and approved in December of 2011. Will the plans and Draft PEIR be updated to reflect this new information?	dataset into the final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, and Alternatives.
051-06	Steve Hayes	City of Riverside	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 24.
052-01	George Scagborough	City of San Clemente	The City concurs with the OCCOG and OCTA comments. The City of San Clemente concurs with the comments SCAG will receive from the OCCOG and the Orange County Transportation Authority (OCTA). The City requests SCAG to respond to all of their comments and to act upon any changes advocated by OCCOG, of which the City is a member agency.	Comment noted.
052-02	George Scagborough	City of San Clemente	The General Plan and Zoning maps for the City are not accurate. SCAG's website allows member agencies to review the maps that would be used for the Draft RTP/SCS and PEIR. We reviewed the latest map files and concluded they are not accurate. The City worked closely with SCAG staff on several occasions to ensure SCAG has accurate maps for the City of San Clemente. Please update the map files to reflect the comments we previously provided.	Comment noted. The map files for the City of San Clemente have been updated to address comment.
052-03	George Scagborough	City of San Clemente	Growth forecast numbers should be at the county level consistent with previous RTPs. The 2012 RTP-SCS, like other planning documents, has been written based on assumptions, market conditions, forecasts, project lists, budgets, datasets, public opinion, and other information that can change after the 2012 RTP-SCS is adopted. Therefore, it is important for the 2012 RTP-SCS to project growth at the county level so cities and counties have the flexibility to respond to these changes when future land use decisions are made. If smaller geographic levels are used (e.g. subregions, cities, census tracts, Transportation Analysis Zones, parcels, or grid cells), it is less likely the 2012 RTP/SCS will forecast actual growth patterns. Therefore, please keep all growth forecast numbers at the county level. This has been the precedent for previous RTPs.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
052-04	George Scagborough	City of San Clemente	OCP-2010 modified numbers should be used. On January 26, 2012, the OCCOG Board of Directors approved an updated version of the OCP-2010 dataset for use in the OC SCS. The dataset includes the 2010 Census population and housign data, along with the 2010 EDD Benchmark data, consistent with SCAg's updated growth forecast dataset. The updated OCP-2010	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS updated all related documents, tables, maps, narrative, modeling runs, Alternatives (including Alternate C referencing the Orange County growth forecasts).

ID	Name	Affiliation	Comment	Response
			dataset was provided to SCAG staff in December 2011. The City requests for all 2012 Draft RTP/SCS/PEIR documents, tables, maps, narratives, modeling runs, PEIR alternatives (including Alternate C/3/Envision 2), and datasets to be updated with the latest OCP-2010 numbers per the OCTA/OCCOG/SCAG Memorandum of Understanding (MOU) that established Orange County's subregional delegation.	
052-05	George Scagborough	City of San Clemente	The OC SCS should be fully integrated into the regional RTP/SCS. The RTP and appendices include numerous references to the OC SCS and SCAG's total use of the document in the regional RTP/SCS. Yet numerous other references suggest SCAG may have modified elements of the OC SCS data. SCAG should include a statement maps, tables, charts, and other information that is necessary to confirm all of the OC SCS land use, socioeconomic, and transportation data was incorporated into the regional RTP/SCS without changes. SCAG staff told the OCCOG Board (at several meetings) the OC SCS data has not been and will not be altered. the OC SCS is to be integrated into the regional SCS without changes per the Memorandum of Understanding (MOU) between OCCOG and SCAG.	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. Land use inputs from GCCOG and OCCOG were not changed per the MOUs between SCAG and the delegated subregions. The final RTP/SCS, final SCS Background Documentation, and final Subregional Sustainable Communities Strategies Appendices have been updated to include clarifying language.
052-06	George Scagborough	City of San Clemente	Mileage-based user fee. The draft RTP suggests $127.2 billion of the approximately $219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a $0.15 gas tax increase between 2017 and 2024. After that, the draft RTP assumes the state or federal government would either replace the gas tax with an indexed mileage-based user fee of $0.05 per mile, beginning in 2025, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee. The City of San Clemente cannot support an increase in fees, including the introduction of a mileage-based user fee, until further economic analysis is completed and presented to the City for discussion. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on the need for a return-to-source criteria, as well as a process for recognizing and rewarding areas which commit additional local revenues.	Comment noted. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources are less than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. An analysis of the economic impacts of the RTP is provided as part of the final RTP/SCS, Economic and Job Creation Analysis Appendix . Please coordinate with SCAG staff to schedule an appropriate time to present this matter to the City for discussion. We agree that return-to-source and rewarding areas that have made substantial strides to obtaining a state of good repair are critical items for any new revenue sources.
052-07	George Scagborough	City of San Clemente	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 26.

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053-01	Tim Hults	City of San Jacinto	Thank you for the opportunity to comment on the 2012-2035 Draft RTP/SCS. Please consider this an official position of support for Amendments 11-03 and 11-06, and especially Project ID RIV62024. Should have any questions or comments, please contact me at the number listed below.	Comment noted.
054-01	Rosa Barela	City of Santa Ana	The growth forecast numbers included in the draft 2012 RTP should allow for reasonable market flexibility. Thus, it is recommended that the growth projections be incorporated and adopted at a County level. Adoption of population, employment and housing growth projection at any smaller geography could introduce unnecessary and unintended challenges for cities and the development community to make reasonable adjustments to land use approvals; and potential inconsistency with the adopted Regional Transportation Plan.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
054-02	Rosa Barela	City of Santa Ana	The Orange County Projections (OCP) are developed every three to four years in cooperation with each individual jurisdiction in Orange County, to reflect the anticipated growth for our communities. We respectfully request that the Regional Transportation Plan be refined to include the latest "OCP 2010-Modified" version that incorporates the 2010 Census and more recent State employment data.	Comment noted. SCAG will incorporate OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS.
054-03	Rosa Barela	City of Santa Ana	The City of Santa Ana appreciate the significant resources and collaborative efforts required to develop the 2012 SCAG RTP; particularly with the SB 375 requirement to incorporate a SCS to integrate land use and transportation planning to promote sustainable communities.	Comment noted.
054-04	Rosa Barela	City of Santa Ana	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 27.
055-01	Julie Skinner	City of Santa Clarita	On behalf of the Santa Clarita City Council, I am writing to request that the Orange Line Development Authority's Northern Corridor be included within SCAG's RTP Constrained Projects List. The Orange Line Development Authority, of which the City of Santa Clarita is a member, is committed to the development of a high speed, grade separated, environmentally friendly and energy efficient transportation system. In recent months, the OLDA Northern Corridor, from downtown Los Angeles to Santa Clarita, has been the focus of intense review and investment. These activities position OLDA's Northern Corridor to be placed within the Constrained Project's List, as opposed to the RTP's Strategic Plan.	Comment noted. For a project to be considered for inclusion in the constrained RTP, the project must be clearly defined, it must have reasonably available funding for implementation, including construction and right of way acquisition, and it must have the concurrence of the relevant county transportation commission/s. As discussed with the Orangeline Development Authority, the Northern Corridor could be considered for inclusion in to the future RTP amendments once these conditions are satisfactorily met. However, the Orangeline section of the Passenger Rail Appendix will reflect the developments brought up in this comment.

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055-02	Julie Skinner	City of Santa Clarita	Los Angeles County Metropolitan Transportation Authority is currently conducting the Antelope Valley Line Infrastructure Improvement Strategic Plan. This plan anticipates the identification of specific projects which can be undertaken in the corridor to enhance service and safety. This study will be completed in spring 2012.	Comment noted. The Antelope Valley Line Infrastructure Improvement Strategic Plan is referred to in Table 2 of the Passenger Rail appendix; as it is an ongoing study, the findings will be incorporated into subsequent RTP updates.
055-03	Julie Skinner	City of Santa Clarita	The Regional Council's approval earlier this month of a Memorandum of Understanding with the California High Speed Rail Authority and transportation commissions paves the way for placement of the statewide high speed rail project within the RTP Constrained Projects List, as the alignment for the high speed rail project falls within the OLDA Northern Corridor. Furthermore, the $1 Billion included within the Memorandum of Understanding contemplates expenditures within the OLDA Northern Corridor during the 2012 RTP horizon. It is also widely anticipated that some of the recommendations identified in the Antelope Valley Line study will also be incorporated into the project list that serves as the implementation of the MOU.	Comment noted.
055-04	Julie Skinner	City of Santa Clarita	Finally, the Ground Access Study being conducted by the Burbank-Glendale-Pasadena Airport Authority and OLDA focuses on multi-modal transportation improvements that will enhance the linkage between the airport, the OLDA Northern Corridor, and communities, such as Santa Clarita, located within the corridor. Clearly, the current study activity along the OLDA Northern Corridor, coupled with specific inclusion of the California High Speed Rail Authority's proposed project along the same corridor, demonstrates that the OLDA Northern Corridor meets the critera for being included within the RTP Constrained Projects List. Within the forseeable future, it is reasonable to conclude that significant investments will likely be made in the corridor, in conformance with SCAG's criteria for inclusion of projects within the Constrained Projects List. On behalf of the Santa Clarita City Council, In encourage SCAG staff and the Regional Council to include the OLDA Northern Corridor within the 2012 RTP Constrained Projects List.	Comment noted. As discussed with the Orangeline Development Authority, the Northern Corridor may be added to the Constrained Plan through a future RTP amendment. However, the Orangeline section in the Passenger Rail Appendix will reflect the developments brought up in this comment.
056-01	Julie Skinner	City of Santa Clarita	The purpose of the RTP is to provide a blueprint for future transportation projects and strategies throughout the SCAG region through 2035. Included within the RTP is a financial plan that identifies funding available to support the region's transportation investments, including transit, highways, local	Comment noted. We acknowledge that additional work is needed before the mileage-based user fee would become effective, which is basis for assumption that implementation begins after 2025. The inclusion of the mileage-based user fee is based on recommendations from two national commissions

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			road improvements, system preservation, and demand management goals. Central to the financial plan is the identification of funding resources the RTP identifies as "reasonably available" for future projects. The City has prepared the following comment regarding the financial plan included within the RTP (Chapter 3): Based on its identification as a "reasonably available" funding resource, the City requests additional information on increased gas taxes on mileage-based user fees as mandatory action items. Over 50 percent of commuters that live in the City work outside of the Santa Clarita Valley. As a result, an increase in gas tax or a mileage-based user fee could result in significant financial impacts on the local labor pool (Page 95, table 3.3).	established by Congress through SAFETEA-LU to establish sustainable transportation revenue sources. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users.
056-02	Julie Skinner	City of Santa Clarita	As required by AB 32 and SB375, this cycle's RTP includes a SCS. The SCS functions as a mechanism to ensure the SCAG region can achieve mandated GHG reductions of 8% per capita by 2020 and 13% per capita by 2035. The draft SCS included in the RTP concludes these targets can be met through a specific land use scenario, called Scenario 2. The scenario was compiled using a variety of data inputs, including a series of workshops hosted by SCAG in a number of communities throughout the region and by working directly with staff at local jurisdictions. The SCS then models GHG based on a variety of factors. Central to Scenario 2 is a shift from larger lot residential development to smaller lot residential development, including more emphasis on multifamily housing. In addition, the scenario assumes a much higher level of infill and mixed-use development than historical development patterns. The City has prepared the following questions and comments regarding the SCS (Chapter 4 of the RTP): For clarity, the scenarios in the RTP should be titled in a consistent manner with the alternatives included in the Sustainable Communities Strategy background documentation. The City assumes "Scenario 2" from the RTP is the same as "Alternative B" in the SCS Background documentation.	Comment noted. Plan "Alternative B" is based on elements of sketch "Scenario 2." The Final 2012 RTP/SCS has been clarified to address comment.
056-03	Julie Skinner	City of Santa Clarita	Throughout the chapter, the RTP refers to Appendix 19. SCAG staff has indicated Appendix 19 is now referred to as the "SCS Background Documentation," however, this is not reflected in the current draft (page 112).	Comment noted. The Final 2012 RTP/SCS has been updated to address the comment.
056-04	Julie Skinner	City of Santa Clarita	Whereas, Santa Clarita agrees with the assumptions contained in the land use Scenario 2 for the region, it should be noted it is	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a

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			unlikely a similar pattern will occur in the Santa Clarita Valley. Although the City's new General Plan, adopted in June 2011, stresses mixed-use and transit-oriented development, significant green-field development is still contemplated within the time horizon of the RTP (Page 115, Figure 4.3)	jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.
056-05	Julie Skinner	City of Santa Clarita	It is unclear how the two areas identified in Ventura County can be considered "urban areas" on par with those identified in Los Angeles, Orange, Riverside and San Bernardino counties. By comparison to those areas identified in Ventura County, the State Route 14 corridor between the cities of Santa Clarita, Palmdale, and Lancaster services a local population of over 700,000 residents and represents a substantial proportion of the new growth in Los Angeles County (Page 125, Exhibit 4.5).	Comment noted. The urban centers identified in SCAG's SCS are examples of areas in each county where strategies such as compact community design, mixed-use development, redevelopment of aging retail areas, greater housing variety, and additional transit service are more likely to succeed.
056-06	Julie Skinner	City of Santa Clarita	One of the three High Quality Transit Areas referenced in the exhibit is the Downtown Newhall area. This area is defined by the Downtown Newhall Specific Plan and is the primary focus of the City's former Redevelopment area. However, given the uncertainty surrounding former redevelopment areas, it is unlikely this location will be able to provide the same type of transit-oriented development and infill contemplated by the Downtown Newhall Specific Plan (Page 134, Exhibit 4.9).	Comment noted. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority. SCAG recognizes that the elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects intended to support the policies in the 2012 RTP/SCS. SCAG will continue to identify funding resources for local governments pursuing such policies.
056-07	Julie Skinner	City of Santa Clarita	The RTP includes future projects in at least two sections: the Constrained List, which is comprised of projects that have identified funding, and the Strategic Plan, which is comprised of projects requiring more study and which lack identified funding. The City has prepared the following comment regarding projects included in the Strategic Plan and not included in the Constrained Plan (Chapter 7): SCAG should consider including the Orangeline High-Speed Transit Project (Union Station to Santa Clarita) in the Constrained List rather than the Strategic Plan, due to the fact the Los Angeles County Metropolitan Transportation Authority has recently accelerated the evaluation of rail improvements along the Antelope Valley Line	Comment noted. For a project to be considered for inclusion in the constrained RTP, the project must be clearly defined, it must have reasonably available funding for implementation, including construction and right of way acquisition, and it must have the concurrence of the relevant county transportation commission/s. As discussed with the Orangeline Development Authority, the Northern Corridor could be considered for inclusion in to the future RTP amendments once these conditions are satisfactorily met. However, the Orangeline section of the Passenger Rail Appendix will reflect the developments brought up in this comment.

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			(Page 196, Table 7.1).	
056-08	Julie Skinner	City of Santa Clarita	As part of our review, the list of Constrained Projects was compared to the schedule of projects included on page nine of the "Measure R Highway Program" report released in January 2012 by the Los Angeles County Metropolitan Transportation Authority. The City has identified two discrepancies between the two documents and is seeking clarification. The discrepancies are as follows: Metro's list of highway projects indicates completion of Interstate 5 truck lanes (Phase 1) from SR-14 to Pico Canyon Road by 2014, while the Financially-Constrained RTP Project List indicates completion of this same project by 2016 (RTP Technical Appendices, page 154).	Comment noted. The completion year in the RTP/SCS Project List is consistent with Metro's Transportation Improvement Program (TIP) submittal, which federal law requires the RTP to be consistent with. We will work with Metro to correct this in a future RTP Amendment.
056-09	Julie Skinner	City of Santa Clarita	Metro's list of highway projects indicates completion of I-5 truck lanes and HOV lanes (Phases 2 and 3) from SR-14 to Parker Road by 2025, while the Financially-Constrained RTP Project List indicates completion of this same project by 2017 (RTP Technical Appendices, page 155).	Comment noted. Thank you for bringing this inconsistency to our attention. Unfortunately, we are unable to revise this at this time as the project is currently listed in Metro's Transportation Improvement Program (TIP) with the completion year that is indicated in the Draft 2012 RTP/SCS. SCAG is required by law to reflect the most current TIP in developing the RTP. However, SCAG will work with Metro in the future to correct this issue in the future TIP and RTP Amendments as necessary and appropriate.
056-10	Julie Skinner	City of Santa Clarita	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 28.
057-01	Dennis Woods	City of South Pasadena	The City of South Pasadena strongly supports a robust multi-modal option. The City of South Pasadena feels that the inclusion of the SR-710 North is flawed and therefore should be removed from the RTP. It is flawed in a couple of areas. By the inclusion of a freeway, evidence is show both from research and actual data on the ground from real life examples, that expanding freeways does not improve Vehicle Miles Traveled (VMT) and does not elevate congestion in the long term. It is also flawed in assuming that it has reasonable funding. We do not believe reasonable funding is through the VMT travel tax and or through the tolls that SCAG is proposing as reasonable. We do not believe it meets the real tenants of SB 375 or AB 32, particularly in regards to reducing VMT. It does not reduce VMT by addition of the SR-710 North. In conclusion, the City of South Pasadena requests that the RTP and the PEIR remove the 710 North extensions. With this inclusion in the Plan it has not been demonstrated that it meets two of the four required tests for	Comment noted. Increase in total VMT in 2035 over the current condition is primarily due to estimated increase of 4 million people over the plan period. However, VMT on a per capita basis will decrease over this period once the plan is fully implemented. While the Plan does include some needed highway improvements, including the SR-710 Transportation Improvement Options project, there is no evidence that these improvements would contribute to the total VMT increase in any discernible way. The 2012 RTP identifies a multi-modal strategy that incorporates transit, highway, and active transportation strategies as well as demand management and congestion pricing strategies to achieve overall improved system performance and reduction in GHG targets required under SB 375.

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			conformity. Sufficient financial resources for the project have not been demonstrated and assumptions regarding regional emissions are flawed. The report impact of the Plan network is based on suspect assumptions. Inclusion of the project at this time will also bias the future project level NEPA and CEQA review that is being done by LA Metro who has not decided on a preferred alternative.	
058-01	Michael Cacciotti	City of South Pasadena	SCAG's welcome deletion of a surface SR-710 north extension should be accompanied by a land-use action to require State disposition of the hundreds of properties now surplus to the surface route.	Comment noted.
058-02	Michael Cacciotti	City of South Pasadena	SCAG should follow the State's designation of an unbuilt SR-710 project as an extension and not a gap closure.	Comment noted. References to the “SR-710 Gap Closure” have been revised to “SR-710 Transportation Improvement Options”.
058-03	Michael Cacciotti	City of South Pasadena	The Plan and DEIR do not meet the legal requirements of the Clean Air Act, the National Environmental Protection Act or Title 23 of U.S. Code: Test 1 Financial Constraint; Test 2: Regional Emissions Analysis	Comment noted. Regarding regional emissions analysis, the RTP/SCS meets these requirements as described in the RTP/SCS Transportation Conformity report. The RTP meets fiscal constraint requirements set forth under applicable federal regulations and guidance, including the requirement that strategies for ensuring availability of new funding sources be identified. See 23 CFR 450.322(f) (1). “Fiscal constraint” means, in part, that the RTP includes sufficient financial information for demonstrating that projects in the RTP can be implemented using committed, available, or reasonably available revenue sources. See 23 CFR 450.104. The SR-710 project is proposed to be funded by both core (Measure R) and new, reasonably available revenues. SCAG establishes that the new funding sources identified for the SR-710 project are reasonably available. As such, strategies delineating required implementation steps for ensuring the availability of proposed new revenues are discussed in the Transportation Finance Appendix.
058-04	Michael Cacciotti	City of South Pasadena	By erroneously specifying only one SR-710 extension alternative—a straight line tunnel—the Plan and DEIR threaten program-level conformity and unlawfully prejudice future project-level environmental analyses.	Comment noted. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
058-05	Michael Cacciotti	City of South Pasadena	Even though the proposed RTP and its shift of truck traffic to the East-West Corridor vitiates the asserted need for an SR-710 tunnel, the plan and draft PEIR should emphasize elimination of	Comment noted. An efficient and extensive rail network is critical to the goods movement system. However, it is not feasible to move all goods by rail, as existing modal segments

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			non-local truck traffic in preference to a direct rail loading at the ports.	generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. Goods moving from the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.
058-06	Michael Cacciotti	City of South Pasadena	The City of South Pasadena requests that the SCAG RTP and PEIR remove the SR-710 north extension. With its inclusion, the Plan has not demonstrated that it can meet two of the four required tests of conformity—sufficient financial resources for the project have not been demonstrated, and assumptions regarding regional emissions are flawed. The reported impacts of the planned network are based on suspect assumptions. Inclusion of the project at this time will bias future project-level NEPA and CEQA review if and when an SR-710 tunnel alignment becomes LA METRO's preferred alternative. Finally, while the circulating draft RTP and PEIR vitiate the need for any SR-710 extension that will produce tolls and relieve congestion, SCAG must discard its emphasis on accommodating any truck traffic from the ports and redraw its plan and assessments to anticipate the direct ship-to-rail transport that enables air-quality conformity and successful port competition.	Comment noted. The RTP/SCS with inclusion of the proposed 710 North Extension project, meets applicable conformity requirements. SCAG recognizes that a project- specific environmental analysis is underway for this project. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis. The responses regarding the tests of conformity can be found in Comment ID# 17641. The responses to comments regarding project-level NEPA and CEQA review, as well as truck traffic can be found in the responses above.
059-01	Omar Dadabhoy	City of Stanton	IT is requested that SCAG continue to utilize growth projection data at the County level as it has done in previous RTP processes. The growth projections for the RTP identify population housing and employment data for the six county SCAG region, from 2008 (existing) to 2020 and 2035. These growth projections represent the best available information from local jurisdictions, the business community and landowners. However, as time passes, what is feasible for any given project can change. .. SCAG should continue to adopt growth projections for the 2012 RTP at a countywide level, consistent with past approvals of RTP growth forecasts. Adopting of the data at a lower level than the county would limit jurisdictional control and create inflexibility in a regional planning document. In addition, the level of geography in which	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.

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			the RTP/SCS growth forecast is adopted should not be determined by other processes. For example, the RHNA allocations must be consistent with the RTP / SCS; state law does not require that they be identical. The RTP/SCS can be adopted at a county level, and the RHNA process can proceed independently until it is complete 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.	
059-02	Omar Dadabhoy	City of Stanton	In regards to the projection data used in the RTP/SCS and the PEIR, on 1/26/2012, the update to the Orange County Projection (OCP-2010) data-set known as the ("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 serves as the formal notice of the update that should be incorporated into the 2012 RTP/SCS, PEIR, and related documents.	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, and Alternatives (including Alternate C referencing the Orange County growth forecasts).
059-03	Omar Dadabhoy	City of Stanton	As part of the SCAG SCS, it was indicated that the OC SCS was incorporated in its entierty without modification. However, there are strategies in the Orange County SCS that are not included in the regional SCS. Similarly, some of those strategies are not consistent with the OC SCS. ..Please clarify the role of the OC SCS in the regional SCS, and when there are inconsistencies in the regional SCS and the OC SCS, whether the OC SCS would be the prevailing document for the Orange county sub-region.	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide.
059-04	Omar Dadabhoy	City of Stanton	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 30.
060-01	Tammy Williams-Anderson	City of Thousand Oaks, Public Works/Transit	Can you send me a copy of the presentation prepared since I was not able to hear it?	Comment noted. All RTP/SCS workshop presentations have been made available on SCAG's website at http://www.scag.ca.gov.
061-01	John Nielsen	City of Tustin	It is stated on page 80 of the Draft RTP/SCS that “the RTP has the ability to affect the distribution of that growth.” This statement appears to contradict SCAG’s agreement pursuant to the Memorandum of Understanding with the Orange County	Comment noted. The final 2012 RTP/SCS has been revised to specify that land use inputs from GCCOG and OCCOG were not changed per the MOUs between SCAG and the delegated subregions.

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			Council of Governments (OCCOG) that the strategies and local land use policies of the Orange County SCS will be respected. The RTP/SCS should acknowledge that the local land use plans in Orange County will not be changed through the RTP/SCS.	
061-02	John Nielsen	City of Tustin	The Draft RTP/SCS suggests that $127.2 billion of an approximately $219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a $0.15 gas tax increase between 2017 and 2024. After that, the report assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of $0.05 per mile, beginning in 2025, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee. The City of Tustin cannot support an increase in fees, including the introduction of a mileage-based user fee, until further economic analysis is completed and until and unless there can be an explanation of the return to source principles which will be used for the distribution of funds collected thereunder. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on a process for recognizing and rewarding areas which commit additional revenues.	Comment noted. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources are less than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. An analysis of the economic impacts of the RTP is provided in the Economic and Job Creation Analysis of the 2012 RTP/SCS Appendix. We agree that return-to-source and rewarding areas that have made substantial strides to obtaining a state of good repair are critical items for any new revenue sources.
061-03	John Nielsen	City of Tustin	The Draft RTP/SCS proposes a number of investments that affect Orange County and go beyond the Long-Range Transportation Plan (LRTP). The City will only consider additional investments after revenues are identified to account for these commitments. The regional strategies identified by SCAG do not have clear funding mechanisms, and it must be made clear that their inclusion in the RTP/SCS does not constitute a commitment to fund and/or implement the improvements.	Comment noted. The RTP/SCS recognizes that transportation decisions are made at the local level and that many of the regional strategies in the RTP/SCS require further study.
061-04	John Nielsen	City of Tustin	The Sustainable Communities Strategy (“SCS”) is recognized as a key portion of the 2012 RTP/SCS, and serves to meet responsibilities associated with SB 375. It is clear the SCS “Goals and Benefits” involve significant local jurisdiction participation and efforts. It is critical for the RTP/SCS to recognize the need to sufficiently fund local agency efforts to assure successful outcomes.	Comment noted. Table 4.3 includes the following action/strategy, "Seek partnerships with state, regional and local agencies to acquire funding sources for innovative planning projects." In addition, SCAG is working to secure incentives for local governments for SCS implementation including additional funding for SCAG’s Local Sustainability Planning Assistance Program (e.g., Compass Blueprint, Green Region) and Strategic Growth Council grants.
061-05	John Nielsen	City of Tustin	Tables 4.3 - 4.7 of the RTP/SCS identify “Action/Strategy” efforts related to the SCS, with local jurisdictions being identified as	Comment noted. Table 4.3 includes the following action/strategy, "Seek partnerships with state, regional and

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			responsible parties for many of the tasks. Without proper funding for local jurisdiction efforts we believe the effectiveness of the “Action/Strategy” measures will be compromised.	local agencies to acquire funding sources for innovative planning projects." In addition, SCAG is working to secure incentives for local governments for SCS implementation including additional funding for SCAG’s Local Sustainability Planning Assistance Program (e.g., Compass Blueprint, Green Region) and Strategic Growth Council grants.
061-06	John Nielsen	City of Tustin	In general, current policies and goals of the RTP/SCS identify projects and funding necessary to successfully implement elements of the RTP/SCS. There are also RTP/SCS goals which essentially require development “from the ground up” at the local level. We agree the most efficient and effective efforts toward meeting these RTP/SCS goals will begin with the local jurisdictions. There needs to be sufficient levels of funding (which do not appear to be addressed in the current RTP/SCS draft) to allow local jurisdictions to adequately initiate these specialized efforts. From a practical perspective, this funding would be expected to yield some of the most immediate and timely results in meeting RTP/SCS goals. They would consider measures which could include, but not be limited to: Programs for improved use of public transit; Responsiveness to demographic changes; Improved management of existing transportation infrastructure and roadways; Employer-based Transportation Management Plans; Trip-reduction efforts including promotion of telecommuting; Carpool/transit parking near transportation corridors; Better “place marking” which includes an increase of walkable environments; Support of bicycle programs including bicycle storage and bike lanes; Bridging gaps between mass transit options and shipping and service centers; Programs for new construction; and reconstruction of non-motorized transportation paths Measures to reduce vehicle miles traveled will involve local jurisdictions and employers to implement many strategies which include but are not limited to measures such as: Increasing rideshare and work-at-home; Investing in non-motorized transportation facilities; Developing appropriate land use strategies o Encouraging universal employee transit access passes; Synchronizing traffic signals; Using LED technology for new traffic signals and street lights; Allocating convenient parking areas, loading areas and larger parking spaces for vans and HOV; Creating ride-sharing programs and provide parking near	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.

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			public transportation; Enhancing safety and cleanliness at transit stations; Providing shuttles to transit; Providing incentives, education and publicity to encourage use of transit It will be necessary to provide funding to local jurisdictions for implementation and/or management of these and other associated measures.	
061-07	John Nielsen	City of Tustin	Table 3.6 shows that the 2012 RTP/SCS anticipates relatively low levels of funding for local streets and roads, including $1.1 billion for FY2011-FY2015, $1.1 billion for FY2016-FY2020, and $1.2 billion for FY2021-2025. Funding is increased to $7.9 billion for FY2026-FY2030 and $9.6 billion for FY2031-FY2035. However, local street and road improvements offer the best opportunity for quickly improving mobility and realizing RTP/SCS goals. They also provide economic benefits which could translate into additional funding in the future. Funding for these programs should be increased and accelerated in the near future.	Comment noted. The funding for local streets and roads operations and maintenance increases substantially beginning in FY 2026 due to the assumption of new revenue sources beginning in that year (see Table 3.5). Accelerating funding for these improvements would require offsetting revenues dedicated to other projects and programs.
061-08	John Nielsen	City of Tustin	One City of Tustin project which has both local and regional significance does not appear to be included in the RTP/SCS. It is therefore requested that the following project be added to the RTP/SCS: o Tustin Ranch Road extension from Walnut Avenue to Warner Avenue, including a new grade separation over Edinger Avenue and the OCTA/SCRRA Railway.	Comment noted. The Tustin Ranch Road extension from Walnut Avenue to Valencia Avenue, including a bridge over Edinger Avenue and the OCTA/SCRRA Railway, is included in the Project List under RTP ID# ORA55244.
061-09	John Nielsen	City of Tustin	The RTP/SCS should identify the regional transportation infrastructure deficiencies broken down by county for purposes of transparency.	Comment noted. The Highways and Arterials Appendix discusses system preservation needs and provides information on distressed lane miles and state highway bridge conditions by county.
061-10	John Nielsen	City of Tustin	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 31.
062-01	James Provenzano	Clean Air Now	The issue of revenue generation to rely on the State budget for resources is risky, there is support for local generation of revenues. I strongly urge keep that in mind and look at those sources and possibly move forward with some action that will help you obtain revenues from local sources.	Comment noted. Comment noted. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
062-02	James	Clean Air Now	The access to mass transit, allowing people to access mass	Comment noted.

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	Provenzano		transit by being able to walk to mass transit or drive fewer miles to mass transit is critical in the overall scheme to the RTP/SCS. Please listen to the comments from the public to help improve what you have done and move the Plan in the right direction that is palpable to everyone that will be impacted by the RTP.	
063-01	Todd Campbell	Clean Energy	Upon review of the proposed RTP/SCS, we felt compelled to comment on the document in its current form as it appears to overemphasize electric and zero emission vehicle strategies without any apparent back up documentation regarding the cost-effectiveness and feasablity of such strategies. Clean Energy strongly recommends that SCAG meet with Clean Energy to discuss our experience within the Industry and share with you how we, as a company, intend to help SCAG reach regional air quality attainment.	Comment noted. The RTP envisions a world-class, coordinated Southern California goods movement system that accommodates growth in ways that both support the region's economic vitality and the quality of life for our communities. As discussed in the Goods Movement section of the RTP, the planning for a zero and near zero-emission future includes the use of near-term alternative fuels and technologies as bridge to the long-term vision. We look forward meeting with Clean Energy to discuss these important issues.
063-02	Todd Campbell	Clean Energy	We strongly urge SCAG to modify its current draft RTP/SCS to specifically highlight natural gas vehicles, in addition to electric and hybrid options, amongst the near zero-emission to zero emission technologies that will help the region meet its criteria air emissions goals under the federal Clean Air Act and greenhouse gas emissions goals under the state's AB 32 - The Global Warming Solutions Act of 20066. Not only does Clean Energy believe that NGVs will continue to be some of the cleanest options, particularly for medium- and heavy-duty vehicles, on the road, they will most likely will also benefit from hybridized platforms, biomethane and hydrogen-blending, and other advancements that may come to market over the next 20 years. We would like to formerly offer an invitation to senior SCAG staff to visit our offices in an effort to better understand our plans to help the region meet its clean air and greenhouse gas goals prior to the finalization of the RTP/SCS.	Comment noted. While the RTP is required to be based on the vehicle fleet assumptions in ARB's EMFAC model, SCAG has sought to further the implementation of alternative fuels in a number of planning efforts. As discussed in the Goods Movement section of the RTP, the planning for a zero-emission future includes the use of near-term alternative fuels and technologies as bridge to the long-term vision. For example, the SCAG Clean Cities Coalition is currently engaged in outreach activities for three projects that support and encourage the use natural gas as an alternative fuel. The Drayage- Natural Gas Truck Replacement Project involves the replacement of old, heavy-duty diesel drayage trucks with new trucks powered by clean natural gas engines, corresponding with the deployment of approximately 180 natural gas trucks. The Liquefied Natural Gas (LNG) - Corridor Expansion Project makes the final connection between the existing public access LNG fuel infrastructure in Southern California and the LNG fuel stations being developed in Utah, providing a 700-mile LNG fueling corridor along one of the nation's most heavily traveled goods movement truck routes between Southern California and Salt Lake City, Utah. And finally, the SANBAG/ Ryder Heavy Duty CNG Truck Replacement Project is funded with $19.2 million to deploy 262 natural gas trucks and construct two fueling stations. There are currently over 130 vehicles deployed, with fueling stations in development. Through Clean Cities, SCAG has shown a commitment to expand the use of a range of

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				alternative fuels. SCAG welcomes further discussion and looks forward to working with Clean Energy.
064-01	Carey Knecht	ClimatePlan	Please find attached our comment letter about SCAG's Draft RTP/SCS Congratulations on the successful completion of a draft Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). This represents the culmination of three years of hard work by your staff, committees, and Regional Council to understand and merge together the land use and transportation plans of hundreds of local governments and agencies. This is a very significant effort that can substantially improve the quality of life, public health, long-term economic competitiveness, and environmental sustainability of the region. Southern California has made some impressive strides in this direction, as reflected in these successes of the plan: • Meets the greenhouse gas reduction targets established by the California Air Resources Board • Reduces overall traffic congestion and allows residents to spend less time in their cars • Triples spending on bike and pedestrian projects and increases transit investments by 13% • Meets the projected economic market demand by planning for a diversity of housing types, including a more adequate number of small-lot single family homes and dwellings in mixed-use, walkable neighborhoods • Addresses habitat loss via planning for more cost-effective future environmental mitigation As organizations that work across the state, we want to recognize and thank SCAG for the enormous progress that Southern California has made in recent years. This is a large and diverse region that has long lacked a transit system with regional reach. Yet Southern California is taking actions that can be a model for regions elsewhere in the state. For example, Los Angeles County's Measure R will generate up to $40 billion, most for transit, and an effort is now underway to accelerate those 30 years of spending into the early years, when jobs are most needed. SCAG has proactively engaged many communities to create a vision for smart growth, first through the Compass Blueprint program and now with the creation of this SCS. This regional plan builds on an innovative model program from Orange County that will address potential habitat impacts in a way that improves environmental benefits while reducing costs through careful, upfront planning. The success of this plan is built upon	Comment noted.

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			just these instances of great local and regional leadership. However, amidst this plan's successes, there are important ways that this plan can make additional strides. The plan as written reveals that on the current course, there are parts of the region making significant investments in transit, bicycle, and pedestrian infrastructure and thereby receiving great benefits, while other areas are making lesser investments, particularly those in Inland Empire counties.	
064-02	Carey Knecht	ClimatePlan	We believe SCAG should pursue additional strategies to expand transit and active transportation opportunities that could have great economic and health benefits for the entire region. We are also concerned that several vulnerabilities in this plan may cause it to not succeed at the level it intends.	Comment noted.
064-03	Carey Knecht	ClimatePlan	I. Create greater opportunity for all Southern Californians As noted above, the growth and investments in this plan have many benefits for the region as a whole. However, transit and active transportation investments are uneven, and as a result, not everyone in the region will receive the same opportunities and benefits. For instance, this plan reveals that per capita, residents in Los Angeles and Orange County will cut the time they spend driving by about 20%, while residents of Imperial, San Bernardino, and Riverside will receive reductions that are half that, or less. In addition, vulnerable populations across the region will face greater risks. Before finalizing the plan, we ask that the Regional Council and staff take some simple steps to allow the region to move forward together. Expand transit service in key areas: This plan expands a network of transit choices, giving many people easier access to multiple transportation options, and taking cars off of the roads so that those who do drive spend less time stuck in traffic. Augmenting these with some additional transit investments would provide more options in currently less-served parts of the region. Expanding bus service levels is the least expensive transit option, and well over 80 percent of those riding transit now do so on bus. The fast-growing Inland Empire counties could particularly benefit from this strategy. The plan shows that only 10% of Riverside County will be served by high-quality bus service (buses every 15 minutes during peak periods). But since about 40% of residents will live near bus lines with a slightly lower level of service (15-30 minute headways), increasing bus	Comment noted. Projects 7120009, 712008, and 712007 are identified as region wide expansions in bus rapid transit, point to point express bus service, and bus service in highly productive corridors, for a total investment of $3.0 billion over the life of the plan.

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			travel frequencies would be a relatively low-cost way to greatly expand the number of residents within walking distance of high-quality public transportation. This would not only help those who choose to take the bus, but it will also relieve traffic for those who still need to drive. Rural parts of the region, such as the eastern Coachella Valley and the North Shore of the Salton Sea, have particularly low access to transit choices even as housing and jobs begin to move into those rural areas. Extending existing bus service to currently unserved rural areas of the Coachella Valley, or exploring options such as local circulators to meet unmet transit needs in rural areas, would also improve access to services and decrease vehicle miles traveled for farmworkers and other rural residents. Additionally, extending planned BRT from Indio to Coachella would make it possible to address the needs of a growing population to access health care, groceries, or good jobs via public transit. Finally, enhancing and expanding the region's MetroLink system, as well as the BRT and bus system that connect to it, can bring to the full Southern California region the world-class transportation network that it deserves. Such enhancements could create greater economic Finally, enhancing and expanding the region's MetroLink system, as well as the BRT and bus system that connect to it, can bring to the full Southern California region the world-class transportation network that it deserves. Such enhancements could create greater economic.	
064-04	Carey Knecht	ClimatePlan	Expand funding and policies for bicycles and pedestrians: This plan could also take one step further toward providing residents with safe routes for walking and biking. While the plan does triple the previous expenditures, it still devotes less than 1.5% of its funds to safe streets, despite the fact that over 20% of all travel trips in the region are on foot or by bike. According to a poll of Southern California voters by Move LA, NRDC, and the American Lung Association last year, if given the choice, voters would spend significantly more of the region's transportation dollars on bicycle and pedestrian investments. The L.A. Department of Public Health recently reported that the funding need could be as high as $40B, yet this plan currently devotes $6B and estimates another $4B is available. This gap should be reduced by increasing regional combined bike and pedestrian funding to at least $12B, in addition to the estimated additional	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.

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			$4B. These funds should create “first mile / last mile” linkages near transit, address safety problems in areas of high injury and fatality rates, provide sidewalks and bike lanes in places with lower car ownership rates or where basic infrastructure is currently lacking, and help children use Safe Routes to Schools.	
064-05	Carey Knecht	ClimatePlan	In addition, we ask SCAG to commit to working with its local governments and agencies to embed a "complete streets" policy in local and regional transportation project planning, to systematize the inclusion of pedestrian and bicycle safety features in road construction and maintenance projects. Doing so will make cost-effective use of these limited funds.	Comment noted. SCAG is committed to working with local jurisdictions in the development, implementation, and maintenance of their local active transportation plans, which includes the adoption of Complete Streets policies.
064-06	Carey Knecht	ClimatePlan	Finally, we ask that SCAG undertake a regional bike/ped master planning effort, similar to the assessment of unmet road maintenance costs that SCAG currently manages. Before the next RTP, SCAG should work with partner agencies and jurisdictions to identify local needs, funding strategies, and revenue sources to create a completed network of safe routes for walking and biking.	Comment noted. SCAG has developed the SCAG Regional Bikeway Network to address regional gaps in the existing bicycle network. SCAG is committed to working with local jurisdictions in the development, implementation, and maintenance of local active transportation plans and incorporating these findings into the 2016 RTP.
064-07	Carey Knecht	ClimatePlan	Further study and aggressively address disparate exposure to air pollution and noise: While this plan would improve air quality in the region overall, we are greatly concerned that air pollution levels would still be highest in areas close to freeways, and that levels in some places could be higher than the “business as usual” or baseline scenario. The Environmental Justice Appendix to the Plan shows that 25% - 27% of households living within 500 feet of freeways could face greater exposures to CO and PM, with high concentrations of minority and low income residents disproportionately affected. The Appendix further highlights that all environmental justice populations except the elderly currently have higher risk of cancer and respiratory disease than the region as a whole, and that the “highest areas of respiratory risk are the segments that closely follow major freeways in the most urbanize portions of the region.” Non-English-speaking, foreign born populations have the highest risk. Before finalizing this plan, SCAG needs to study where and how disproportionate impacts will occur, by providing a map showing where this will be happening, and then identify a complete suite of mitigations to ensure that air pollution and noise impacts do not get worse for the most vulnerable while getting better for others. One possible tool is the list of model	Comment noted. Data and analysis included in the Environmental Justice Appendix does not account for Plan improvements in vehicle technology particularly for truck only corridors. These corridors in the Plan are exclusively for zero and/or near-zero emission vehicles. Furthermore, the Program Environmental Impact Report (PEIR) accompanying the RTP/SCS includes mitigation measures that would reduce impacts associated with health risk within 500 feet of freeways and high-traffic volume roadways to less than significant. Analysis included in the Appendix also does not account for emissions improvements through the implementation of these mitigation measures. As such, emissions and exposure analysis shown in this Appendix is abundantly conservative and demonstrates worst-case scenario outcomes. If these emissions improvements had been accounted for, we believe the analysis would show little or no areas with worsened emissions (“hot spots”) associated with the Plan. Moreover, the currently available data on emissions and on the distribution of households and population is imprecise such that the overlay with emissions and EJ populations will tend to overstate any potential impacts. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages

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			"Health and Equity metrics," including a methodology for calculating those metrics, created by Human Impact Partners in partnership with other health experts and organizations.	project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with the mitigation identified and to be implemented as part of the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level.
064-08	Carey Knecht	ClimatePlan	Monitor the plan's impacts on key indicators of health and equity, and improve tools for future planning: Addressing inequalities requires understanding them. Particular trends that this plan has a limited ability to project and mitigate – such as the risk of gentrification and displacement near transit stations, injuries / fatalities to pedestrians and cyclists, asthma incidence and exacerbations due to NOx, and the balance of wages to housing costs – should be actively monitored. To carry this out, SCAG should monitor these issues at a regional scale and also identify particular places to monitor, including areas near transit stations – where shifting demographics suggests that gentrification may already be underway – and also a selected group of areas known to have particularly vulnerable populations. In addition to tracking this plan's performance, SCAG should commit to developing specific tools to project future plans' impact on critical issues, such as the fit between job wages and housing costs; physical activity; the health impacts of the physical activity and air quality created by the plan; and other measures from the "Health & Equity metrics" mentioned above.	Comment noted. (1) SCAG is committed to analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. Trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) on gentrification/displacement are inconclusive. SCAG will continue to monitor this matter based on the framework presented in the EJ analysis in the coming years. (2) SCAG is continuing to monitor and track place-based development/growth and any associated environmental and safety indicators for future Environmental Justice studies. In previous Regional Transportation Plans (RTP) as well as for this Plan, hot spots of emissions and noise concerns are identified, presented, and mapped in the Environmental Justice Appendix. SCAG will take the comment and suggestion into consideration to expand its existing efforts and establish a region wide monitoring program to focus on selected environmental justice areas and communities of concern. (3) SCAG is currently in the process of enhancing our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016.
064-09	Carey Knecht	ClimatePlan	II. Ensure the Regional Transportation Plan's Strengths Become Reality This plan has much good news for the region, and the recommendations below are designed to help the plan's strengths become reality. Ensure revenues materialize: Significant new resources are needed for the plan to come to fruition. We ask SCAG to take a leadership role in convening other agencies and jurisdictions to generate the revenues that this plan depends on for success. In developing this plan, the region was faced with a large funding shortfall. The Regional Council made the policy decision not to cut projects but to find	Comment noted. We agree that government, business, and stakeholders need to work together to identify and advance the best, most appropriate funding options to provide needed funding for RTP priorities. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical

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			additional revenue sources to pay for its infrastructure plans. The current plan assumes that these needed funds will come from state and federal governments, but as history shows, this is not guaranteed. We hope the region will focus on what it can do to raise money via a combination of regional and local fees or taxes. These new revenue sources should be chosen to avoid adverse impacts to the region's lower-income populations. As funding gaps are likely to continue over the long run, we would also recommend that the region follow the example of other regions in considering how to systematically prioritize those expenditures that most contribute to a sustainable, healthy, and equitable region. Between now and the next SCS, SCAG and its partner agencies could develop a systematic method for prioritizing projects, such as the Project Performance Assessment conducted at the Bay Area's Metropolitan Transportation Commission.	growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. Numerous studies have been conducted nationally to evaluate mileage-based user fee options. SCAG concurs that further work would be necessary before implementation. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Apppendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users. We also recognize that the future cannot be known with absolute certainty and we therefore made reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and documented in the Draft RTP to ensure transparency. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
064-10	Carey Knecht	ClimatePlan	Frontload and expand funds for transit and bike / pedestrian linkages, and for road and bridge safety projects: We ask that in collaboration with its partner agencies and jurisdictions, SCAG lead an effort to accelerate the transit, bike/ped, and road maintenance projects that are essential to meeting the region's goals into earlier years when revenue is more reliable. Making transportation investments in a timely way ensures that they have maximum impact. Yet, this plan accelerates road construction projects while delaying essential investments in road maintenance, bike and pedestrian safety, and transit to the late years of this 24-year plan. Delaying road repairs is a bad idea, because deferred maintenance leads to increasingly costly repair needs. Also, delay endangers road and bridge users – in a region where more drivers already cross structurally-deficient bridges than anywhere else in the United States.1 Delaying projects that can create a multimodal network with a variety of transportation options also concerns us, because future revenues in this plan are less certain. Transportation investments that not only support driving but also create	Comment noted. SCAG cannot unilaterally change the near term commitments that are already in place. Significant increase in funding for active transportation proposed in the 2012 RTP/SCS is largely predicated on additional revenues from new sources that will require future actions at the state and/or federal levels. Therefore, the plan realistically assumes that these funds will not be available in the near term. The earliest these funds are expected to be available is 2026. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.

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			convenient public transit options and safe routes for walking and biking are essential for achieving the region's traffic reduction and air quality goals.	
064-11	Carey Knecht	ClimatePlan	Help local governments plan the transit neighborhoods of the future: We ask that SCAG help local governments plan the diverse transit-oriented or transit-ready neighborhoods that this plan relies upon by making a firm commitment to funds for Compass Blueprint. The draft RTP/SCS assumes that many of the region's homes and jobs will grow as real estate market trends predict they will, in walkable neighborhoods surrounding transit corridors and light rail stations. But many cities are still in the process of updating land use plans to allow that kind of development. Without those plans in place, it is much more difficult for builders to get projects approved and begin construction. With local governments' planning funds at historic lows, funds to finish this planning may not exist. That makes it essential that the region expands its Compass Blueprint incentive grant program to help local governments plan the kind of neighborhoods that this plan needs to succeed. SCAG should make a clear financial commitment that this will happen. In doing so, SCAG should use these grants first to fund those local governments that stand ready to create healthy, walkable neighborhoods for households at a range of income levels. SCAG should update its Compass Blueprint grant criteria to ensure that neighborhoods near present or future transit stations or corridors will have safe streets for walking and biking, and a mix of housing types to allow people of a range of incomes to live and work near transit.	Comment noted. Through the Compass Blueprint Program, SCAG has worked with and provided direct technical assistance to 94 separate jurisdictions including local cities, counties, non-profits, and transportation agencies. Future calls for applications will focus on local implementation of SCS strategies, and will prioritize projects located in High Quality Transit Areas (HQTA). In addition, other local and regional funding agencies have begun to incorporate Compass Blueprint principles into their discretionary funding programs. SCAG will continue to pursue dedicated and discretionary funding for this important voluntary program.
064-12	Carey Knecht	ClimatePlan	SCAG's environmental justice appendix shows that areas near transit are already losing low-income populations. Lower-income households are more likely to utilize transit services that are available to them, so building housing affordable to those households near transit will maximize the benefit of the region's infrastructure investments. As growth patterns become more compact, SCAG should also carefully monitor and seek resources that could ameliorate and improve rural housing stock.	Comment noted.
064-13	Carey Knecht	ClimatePlan	Address gaps in the link between growth and transportation planning: The success of all regional Sustainable Communities Strategies depends on a well-coordinated link between where	Comment noted. After adoption of the Plan, SCAG will continue to work with member agencies and other stakeholders to assist in implementing the strategies within the 2012-2035 RTP/SCS.

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			growth will happen and where transportation infrastructure will be provided. In places where this link remains weak, SCAG should host conversations between local governments and transportation agencies that will better align transit planning with future growth and housing. Where growth does occur as greenfield development, SCAG should make sure that this habitat and farmland loss is adequately mitigated by ensuring regional mitigation planning includes not only critical habitat and lands within Habitat Conservation Plan / Natural Communities Conservation Plan Areas but all important undeveloped lands, through an inclusive public process. Finally, to make sure the region's analysis rests on a solid foundation, SCAG should ensure that its High Quality Transit Area calculations accurately includes only the geography around bus stops, not the entire corridor adjacent to a highway that a bus travels along. Thank you very much for your consideration of these comments, designed to strengthen and support the success of your work in Southern California. We want to again express our appreciation and gratitude to SCAG's Regional Council, committees, and staff. Your efforts to implement SB 375 can help reduce climate change and ensure that future generations of Californians have cleaner air and water, healthier places to live, a stronger and more resilient economy; and greater opportunity for people across the economic spectrum.	
065-01	Tom Kirk/Rick Bishop	Coachella Valley Association of Governments and Western Riverside Council of Governments	CVAG, WRCOG and our respective member jurisdictions worked with SCAG representatives to develop growth projections for the Coachella Valley and Western Riverside County subregions, and we appreciate SCAG's acceptance of our local input on these overall growth projections. These growth forecasts for population, housing, and employment in Riverside County underwent extensive review by both Agencies' members. Both the CVAG Executive Committee and the WRCOG Executive Committee adopted subregional growth forecasts at the jurisdictional (i.e. City and County) level. The Riverside County Board of Supervisors also approved growth forecasts for Riverside County at the jurisdictional level. Neither CVAG, WRCOG, nor the Board of Supervisors have endorsed or approved subregional growth projections at the TAZ level, nor were any more ambitious TAZ level plans made generally available to and generally accepted by the local planners in	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			Riverside County. We acknowledge SCAG's usage of TAZ-level data for scenario modeling purposes during the development of the Draft 2012 RTP/SCS. However, we did not anticipate the TAZ data that was recently released by SCAG; nor do we agree that they depict a realistic land use pattern that can or will be achieved in Riverside County by 2035. In most cases, the 2035 TAZ maps substantially deviate from our jurisdictions' adopted General Plans, and also deviate from other land use approvals. We are also concerned that these maps were only recently made available to us for review. Due to the schedule of the Draft RTP/SCS public comment and review period, CVAG and WRCOG were not given substantial time to analyze this information and consult with our member jurisdictions regarding the potential implications of the growth projections depicted in the 2035 TAZ maps. Accordingly, although CVAG and WRCOG support the use of the underlying projected population, household, and employment counts for policy purposes at jurisdictional levels, we do not support the use of the counts reflected in the recently-disclosed TAZ maps as a basis for CEQA streamlining or SCS consistency review under CEQA. Nor do we support the use of these maps for purposes of determining future infrastructure planned in Riverside County. Furthermore, we do not support the use of this information for the purpose of land use regulation or regulatory purposes of any kind. Finally, CVAG and WRCOG do not support SCAG's use of the TAZ maps and... [continued in next comment]	
065-02	Tom Kirk/Rick Bishop	Coachella Valley Association of Governments and Western Riverside Council of Governments	[continued from last comment]...supporting data for determining future allocation of Compass Blueprint Program funds or any other funding incentives administered by SCAG or others. We strongly urge that SCAG clarify that the use of TAZ-level data is for SCS modeling purposes only, and remove any language and policy statements from the Draft 2012 RTP/SCS that otherwise strengthen the standing of these unapproved data.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The final RTP/SCS has been updated to addressreflect the comment.
066-01	Michael Antonovich	County of Los Angeles Board of Supervisors	As a Los Angeles County Supervisor, Vice-Chair of the Los Angeles County Metropolitan Transportation Authority (MTA), and SCAG Board Director, it is my pleasure to request that this subcommittee recommend to the SCAG Regional Council the inclusion of a high speed rail study within the proposed High Desert Corridor project between Victorville and Plamdale as	Comment noted. The environmental study of a high speed rail component within the High Desert Corridor between Victorville and Palmdale has been included in the contrained portion of the final RTP/SCS (Constrained Plan).

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			part of the Constrained Regional Transportation Plan.	
066-02	Michael Antonovich	County of Los Angeles Board of Supervisors	The importance of the High Desert Corridor has been well-noted by the federal government, which designated the project as a "Corridor of National Significance" with its "E-220" designation in SAFETEA-LU. Support for this project started with the Counties of Los Angeles and San Bernardino partnering to create a Joint Powers Authority (JPA) to oversee the development of this corridor. Since this time the project has also been endorsed in the constrained portions of the SCAG's Regional Transportation Plan, the Regional Transportation Improvement Plan, and the MTA Long Range Transportation Plan. the potential for this corridor to divert car and truck trips from the heavily-populated, congested and emissions-plagued Los Angeles and San Bernardino baisns has gained national attention as a vital solution to the confluence of local, regional and national car and truck traffic within the region's current freeway system.	Comment noted.
066-03	Michael Antonovich	County of Los Angeles Board of Supervisors	The High Desert Corridor JPA Board of Directors has always envisioned this corridor as a public-private partnerrship that would require multiple elements to create a multi-modal corridor that met the region's needs for car, truck and transit infrastructure improvement. Inclusion of a high-speed rail component within the right-of-way of the High Desert Corridor reflects the desire of the JPA Board of Directors to connect Palmdale and Victorville with at minimum an enhanced 110 mile-per-hour high speed Metrolink corridor, and potentially a 220 mile-per-hour high speed rail corridor compatible with both the California and DesertXpress High Speed Rail systems. Currently the JPA Board has not entered into any agreement with Metrolink, California High Speed Rail, Amtrack or DesertXpress to partner with the JPA in operating service on this high speed rail corridor. Rather, the JPA will remain partner-neutral until which time the Public-Private Partnership Request for Proposals process calls for a decision to be made by the High Desert Corridor JPA and its partners in MTA and SANBAG.	Comment noted.
066-04	Michael Antonovich	County of Los Angeles Board of Supervisors	By combining the environmental study of this high speed rail component of the High Desert Corridor into the current environmental work for the highway portion of the project, the JPA Board strives to provide a cost-effective manner of implementing this transit aspect of the project as cost-	Comment noted. The environmental study of a high speed rail component within the High Desert Corridor between Victorville and Palmdale has been included in the constrained portion of the final RTP/SCS (Constrained Plan).

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			effectively as possible while staying within SCAG's envelop of $8.2 billion in the proposed Regional Transportation Plan. By including a vital high speed rail component, the High Desert Corridor stands poised to become a model public-private partnership project which captures the multi-modal requirements of AB 32 and SB 375 while leveraging private capital and improving the national movement of truck freight as encouraged by federal transportation policy. Thank you for your support of the inclusion of the High Desert Corridor, including the environmental study of a high speed rail component within its right-of-way, in the Constrained portion of SCAG's Regional Transportation Plan.	
067-01	Paul Simon	County of Los Angeles Department of Public Health	Target and increase investment for active transportation. We applaud SCAG's proposed increased investment in active transportation, from $1.8 billion in the 2008 RTP (less than .5%) to $6 billion (1.3%) in the current draft plan.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
067-02	Paul Simon	County of Los Angeles Department of Public Health	DPH strongly encourages that the final plan: (1) Prioritize (i) first-mile/last-mile connections to transit stations which will help support the increased investment in the transit system; (ii) projects that close gaps in key bicycle and pedestrian corridors; and (iii) communities with high numbers of bicycle and pedestrian injuries and high rates of chronic disease; (2) Front load active transportation funding so it is available to jurisdictions to build walkable and bikeable communities early on in the 25 year RTP period; and (3) Provide funding and technical assistance for cities to create bicycle and pedestrian plans and city-wide safe routes to school plans. Offer support to CTCs and local jurisdictions to adopt a complete streets policy so that pedestrian and bicycle improvements can be made routinely and more economically when streets are improved or	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.

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			built.	
067-03	Paul Simon	County of Los Angeles Department of Public Health	In addition, the plan should include further investments in active transportation to create 1) basic bicycle and pedestrian infrastructure in key areas in every city in the SCAG region; 2) bikeable and walkable neighborhoods within 1/2 mile of all TODs, existing and planned; 3) complete routes to public schools throughout the region that children can walk and bike to; 4) sidewalks repair throughout the region; and 5) improved continuity in county bike networks. Given that cities' bicycle and pedestrian master plans have a range of costs for proposed improvements, we present a range for the estimated amount of active transportation funding needed to generate these improvements across the region, from a low of $37 billion (7.1%) to a high of $60 billion (11.4%) over 25 years, adjusted for inflation. We recognize that there are many factors that must be considered in your resource allocation decisions and, therefore, do not provide these estimates as a recommendation for funding.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
067-04	Paul Simon	County of Los Angeles Department of Public Health	Build healthy neighborhoods around transit stations that protect existing low-income residents. The area around rail stations offers a unique opportunity to create safe access to transit and to address key community needs such as mixed-income housing and business/retail corridors within a walkable and bikeable community setting. However, without careful planning, the people in neighborhoods adjacent to rail stations can be displaced as real estate prices rise in response to new development, triggering corresponding increases in residential and commercial rents for low-income families and small business owners. DPH encourages that the plan: Prevent displacement of existing low-income residents, fund jurisdictions to create transit-oriented development plans that include policies to preserve existing affordable housing and small business store fronts and to ensure the provision of affordable housing and small business store fronts in new developments; Whenever possible, locate housing, child care facilities, schools, and other sensitive-use development far enough away from sources of pollution to decrease exposure that can negatively affect health.	Comment noted. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. Trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor this information in the future as the economy is recovering. We look forward to continuing to work with environmental justice and public health stakeholders on strategies to prevent displacement. SCAG also looks forward to working with public health stakeholders on strategies to reduce pollutant exposure to sensitive populations. Further, the Environmental Justice Appendix has been revised to include health impacts on children 5 years old and below, as further recognition of this important public health issue.
067-05	Paul Simon	County of Los Angeles	Strengthen public health modeling and monitoring. We encourage SCAG to measure the public health impacts of	Comment noted. Consistent with updated CTC Guidelines, and stakeholder requests, SCAG has included numerous health

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		Department of Public Health	transportation investments. For example, the RTP could be analyzed for its potential to reduce chronic diseases in the SCAG region, such as heart disease and breast cancer, based on increases in walking and biking, linked to active transportation scenarios. Specifically, DPH encourages SCAG to: Measure the health benefits of transportation plans by integrating health outcomes into SCAG's modeling approaches; Measure and report on additional public health indicators including but not limited to: bicycle and pedestrian injuries and collisions by geographic areas; percentage of households that can walk or bike within 10 minutes to reach their daily destinations, e.g. transit, schools, childcare, parks; percent of income consumed by housing and transportation costs; and Conduct targeted analyses in neighborhoods adjacent to rail stations to determine if displacement of existing residents is occurring as development occurs.	based metrics not previously included in the RTP. SCAG will explore further improving the assessment of health benefits of active transportation and other RTP/SCS policies in the future RTP/SCS updates.
068-01	Thomas Mauk	County of Orange	Orange County Sustainable Communities Strategy In 2010, the Orange County Council of Governments (OCCOG) requested delegation to develop a subregional Sustainable Communities Strategy (SCS) for Orange County. OCCOG entered into a Memorandum of Understanding (MOU) with SCAG that has allowed OCCOG to develop the Orange County Sustainable Communities Strategy (OC SCS) which will be incorporated into SCAG's 2012 RTP/SCS. The OC SCS, approved by the OCCOG Board of Directors on June 23, 2011, describes the policies and programs that Orange County local jurisdictions will implement to reduce greenhouse gas (GHG) emissions to 2005 levels by the year 2035 and reflects current land uses, existing entitlements, proposed development (e.g., general plans, zoning maps, etc.) and forecasted population, housing and employment growth in Orange County (i.e., Orange County Projections [OCP] 2010-Modified, January 2012). Pursuant to the MOU between SCAG and OCCOG, the OC SCS is to be fully incorporated without change. Although there are several references to the OC SCS in both the RTP/SCS and PEIR, it remains unclear whether the data contained in the OC SCS has remained unchanged in each proposed alternative. Without the underlying data for each alternative available for review, this cannot be confirmed. It is requested that language, maps, tables, and charts be added to demonstrate that the underlying land use, socioeconomic, and	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. Land use inputs from GCCOG and OCCOG were not changed per their subregional SCS agreements. The final RTP/SCS SCS Background Documentation and Subregional Sustainable Communities Strategies Appendices has been updated to include clarifying language. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.

ID	Name	Affiliation	Comment	Response
			transportation data for Orange County (OCP 2010- Modified) has been incorporated into the regional RTP/SCS and each of its plan alternatives without alteration as agreed to in the MOU. It is also requested that the adoption of the growth forecast numbers by SCAG's Regional Council and/or Joint Policy Committee be at the county level, consistent with past RTPs. A review of the policies and strategies contained in the RTP/SCS has revealed the potential for inconsistency with land use policies and/or County operations in the unincorporated area. The County requests that the RTP/SCS include language that acknowledges and incorporates the fifteen "OC SCS Sustainability Strategies A through O," contained in Chapter Three, and the "Sustainability Strategies," contained in Appendix F, of the OC SCS as specifically appropriate for the Orange County Subregion.	
068-02	Thomas Mauk	County of Orange	SB 375 Considerations The County is deeply concerned with the broadness of the PEIR and RTP/SCS. At a presentation held at the CEHD meeting on January 8, 2009, SCAG then interpreted SB 375 to only include VMT associated with vehicles and light trucks, and went on record that green buildings, energy efficiency, municipal operations, waste management, water and technology programs and measures were not within the purview of the SCS. The draft RTP/SCS and PEIR, however address all of these subject areas. We believe that SCAG's original 2009 interpretation is the legally correct one under SB 375 and that SCAG should amend the document to delete all references and measures to items outside of SB 375 that do not directly relate to VMT from vehicles and light trucks. The RTP/SCS and PEIR should not be used as an umbrella document for all things SCAG considers sustainable. The legislative text of SB 375 states that state transportation funding will be prioritized and allocated to those local agencies that are consistent with an approved SCS. The actual SB 375 statutes do not specifically state how this will be done and what exact funding will be subject to SCS prioritization. There has been no follow-up legislation or other policy of which the County is aware that clarifies this issue. Due to this, SB 375 enforcement is unclear. We believe that SCAG should clarify and elaborate on its understanding of this issue. Much more information is needed as to the process, if any, that SCAG will employ to make	Comment noted. It is not SCAG's intent to obligate local governments in Orange County to undertake more strategies, programs and mandates beyond those included in the OC SCS. All the land uses, growth forecasts, projects and strategies in the Orange County Council of Governments Subregional Sustainable Communities Strategy have been fully incorporated in SCAG's RTP/SCS.

ID	Name	Affiliation	Comment	Response
			SCS consistency findings. Will SCAG make SCS consistency findings for individual programs and projects? Will a subregional delegate who has prepared its own SCS, like OCCOG has with the OC SCS, have the authority to make such findings? Will the local programs and projects within Orange County boundaries also be subject to consistency findings by SCAG under its approved SCS? What types of local programs and projects will be subject to a SCS consistency review? These questions and many other must be answered prior to effective implementation of the policies set forth in SB 375.	
068-03	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 60-62: Information is presented on airport ground access and airport financial and marketing strategies. These strategies identify potential sources of funding such as: a) charging fees for private vehicles picking up and dropping off passengers at congested airports; b) a regional funding mechanism using revenues generated at congested airports to support facilities and development at alternate airports (requiring new legislation); and c) funding a region-wide marketing effort through sources such as airport parking and rental car transactions. Including these specific strategies in the RTP document may raise expectations that these strategies are supported by airports in the region. However, due to the competitive nature of most airports, it may be difficult to achieve such support. It may also be challenging to garner airline and FAA support. It is suggested that the airport strategies text be revised to recognize that any incentives or funding mechanisms that are proposed, and which affect other airports in the region, should be developed through regional consensus. Although many of the SCS "Airport Policies and Action Steps" suggest such an approach, this should be stated in the strategies text as well, and it should be clear that while these strategies may be explored, they may or may not be pursued. Additionally, SCAG should invite the FAA and airline representatives to be part of any discussions which address the concept of using revenues from one airport to benefit another.	Comment noted. Additional language has been added to the referenced section that will emphasize the need for a regional consensus in order to implement regional airport financial and marketing strategies.
068-04	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 61: A revision to the Airport Ground Access Strategy section (end of the first paragraph) is suggested as follows: "Potential sources of funding could include charging fees for private vehicles picking up and dropping off passengers at the congested airports. This	Comment noted. This section has been revised to delete the description of the referenced strategy as not having an adverse impact on airport revenues.

ID	Name	Affiliation	Comment	Response
			[delete]would not adversely impact existing airport revenues and would[/delete] could have a number of advantages ..... " This revision is proposed because, with respect to the third bullet, a case could be made that although there are advantages to passengers using public transportation, it is possible that parking revenues would be adversely impacted.	
068-05	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 61: The Airport Financial Strategy section should be revised to avoid making inferences that an issue "should not be controversial," especially related to a strategy that identifies a requirement for legislative changes allowing funds from one airport to be used at another airport(s) not operated by the same entity. It should also be clarified that such legislative changes would be needed at both the state and federal levels.	Comment noted. This section has been revised to delete the description of the referenced strategy as likely to not be controversial.
068-06	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 62: The Airport Marketing Strategy section suggests that SCAG work with regional stakeholders to develop region-wide marketing efforts to promote alternatives to the use of congested airports. A variety of funding sources is suggested; however, airport parking and rental car transactions are specifically mentioned. These funding sources may or may not be supported by airports in the SCAG region and should be thoroughly discussed and, as stated in the document, a consensus of the region's airports should be developed before proceeding with such a strategy.	Comment noted. Language has been added to the referenced section to emphasis the need for a regional consensus of airports in order to implement a regional airport marketing strategy.
068-07	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 62: The Airport Policies and Actions Steps identify certain actions that are recommended by SCAG. The sub-section, Airspace Planning and New Technologies, identifies policies related to modifications to the regional airspace system, and airspace capacity and constraints. It is suggested that the wording, "in coordination with the FAA," be added to each of the bullet points in this section.	Comment noted. The involvement of the FAA is mentioned twice in the action steps for the Airspace Planning and New Technologies policies, which were thoroughly reviewed, revised and eventually approved by SCAG's Aviation Technical Advisory Committee over a series of meetings. We agree that any future implementation of these policies and action steps will involve close coordination with the FAA.
068-08	Thomas Mauk	County of Orange	Chapter 1-Vision, Page 15, Table 1.3: Note, via additional check, connection between "Safety and Health" and "Encourage land use and growth patterns that facilitate transit and non-motorized transportation."	Comment noted. Table 1.3 is intended to identify the linkages between RTP/SCS goals and the performance measures used. To that end, the linkage between active transportation and health is more directly expressed by the check mark connecting "Safety and Health" and "Protect the environment and health for our residents by improving air quality and encouraging active transportation".
068-09	Thomas Mauk	County of	Chapter 2-Transportation Investments, Page 53: The collection	Comment noted.

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		Orange	of additional data on active transportation, including greater specificity in destinations, geographic detail, and types of active transportation, is important in ensuring data driven transportation systems.	
068-10	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 53: The proposed expansion of bikeways represents an exciting opportunity to facilitate active transportation, improve air quality, and reduce chronic disease risk. The connectivity of such an expanded bikeway network with transit systems, centers of employment, and residential areas, particularly those most likely to use and benefit from such assets, is also an important part of such a plan.	Comment noted.
068-11	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 53: The improvement of sidewalk infrastructure proposed in the RTP/SCS is likely to facilitate walking as sidewalk quality can be a key factor affecting walkability.	Comment noted.
068-12	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 54: Safe Routes to School: Besides their benefits in reducing congestion related to the drop-off and pick-up of students, Safe Routes to School initiatives can facilitate important daily incidental walking and biking, which can substantially increase the chances of children meeting daily physical activity recommendations. Though the draft RTP/SCS recognizes the importance of Safe Routes to School, it could better detail how Safe Routes to School programs, assets, and principles will be integrated into the plan.	Comment noted. SCAG is committed to working with local jurisdictions in their development, maintenance, and implementation of local active transportation plans, including policies such as Complete Streets and Safe Routes to School.
068-13	Thomas Mauk	County of Orange	Chapter 2-Transportation Investments, Page 54: SCAG's encouragement of Complete Streets is important to the local implementation of Complete Streets policies consistent with AB1358. Augmented and explicit support in the RTP/SCS for physical and engineering changes that facilitate safe multi-modal, multi-user roadway utilization may be beneficial. Consider increasing regional coordination in Complete Street policy implementation to facilitate continuity across local jurisdictions.	Comment noted. SCAG is committed to working with local jurisdictions in their development, implementation and maintenance of Complete Streets policies.
068-14	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 150, Table 4.3: We would be excited to participate in the Action/Strategy, "Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities." The inclusion of "Local Jurisdictions" in the "Responsible	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.

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			Parties" field would further bolster local collaborations, including those with Public Health Departments.	
068-15	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 150, Table 4.3: The Action/Strategy "Consider developing healthy community or active design guidelines that promote physical activity and improved health" has considerable promise. The inclusion of "State" in "Responsible Parties" would bolster coordination, collaboration, and support in generating guidelines.	Comment noted. SCAG has addressed the request to include "State" in "Responsible Parties" for this action/strategy.
068-16	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 150, Table 4.3: In reference to "Engage in a strategic planning process to determine the critical components and implementation steps for identifying and addressing open space resources," please consider including increasing / preserving park space, specifically in park-poor communities.	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
068-17	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 150, Table 4.4: Perhaps the Action/Strategies "Encourage the implementation of a Complete Streets policy" and "Emphasize active transportation projects as part of complying with the Complete Streets Act (AB 1358)" could be tied together somehow given they will likely be implemented in concert.	Comment noted. SCAG has addressed the request to combine the actions/strategies.
068-18	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 150, Table 4.4: The Action/Strategy "Develop infrastructure plans and educational programs to promote active transportation options" may benefit from engaging local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, who may already have components of such educational programs in place.	Comment noted. The final RTP/SCS has been updated to reflect comment, as appropriate.
068-19	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 150, Table 4.4: We also had some additional suggested language. The additions are underlined: 1. Perform and support studies with the goal of identifying innovative transportation strategies that enhance mobility and air quality, and determine practical steps to pursue such strategies. [add]Engage local communities in planning and prioritization efforts.[/add] 2. Continue to work with neighboring Metropolitan Planning Organizations to provide alternative modes for interregional travel, including Amtrak and other passenger rail services, [add]and an enhanced bikeway network, such as on river trails.[/add] 3. Prioritize transportation investments to support compact infill	Comment noted. The final RTP/SCS has been updated to reflect comment, as appropriate.

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			development that includes a mix of land uses and housing options, [add]including park space[/add], where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	
068-20	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 152, Table 4.5: We also had some additional suggested language…: Sustainable Support work-based programs that encourage emission reduction strategies and [add]incentivize active transportation commuting or ride-share modes.[/add]	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
068-21	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 162, Table 5.1: Augment Safety and Health indicators within RTP performance measures. Consider measures of obesity, non-motorized commuting, walking and biking behavior, asthma hospitalization rates, etc.	Comment noted. The performance measures portion of the 2012 RTP/SCS was developed through extensive participation and input from stakeholders in the region, as well as collaboration with other large MPOs in the state. For example, to facilitate the dialogue and development of performance measures for the 2012- RTP/SCS, a Performance Measures Subcommittee was established in May 2011. The Subcommittee met and gathered extensive input from various stakeholders and provided recommendations to the Plans and Programs Technical Advisory Committee for further discussions prior to forwarding to the Policy Committees. As a result of the input process and deliberations, over 20 new performance measures have been added to the RTP/SCS including new categories such location efficiency. In addition, performance measures are also developed in two types based on their intended uses: one for alternatives evaluation and the other for on-going monitoring. Building on the progress, staff will continue investigating additional measures for future plan updates.
068-22	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 110: The goals and benefits of the SCS listed here go above and beyond the requirements of SB 375. The provisions of SB 375 require the development of a SCS that focuses on a reduction of vehicle miles traveled by cars and light trucks, and greenhouse gas emissions. A presentation made by SCAG in January 2009 indicated that "SB 375 is not about: green buildings, energy efficiency, municipal operations, waste management, water, technology." However, all of these items have been incorporated into the RTP/SCS and PEIR.	Comment noted. The co-benefits summarized in Chapter 4 illustrate the potential benefits of the actions and strategies contained in the RTP/SCS far beyond reducing vehicles miles traveled, and consequently GHG emissions. With this in mind, the actions and strategies included in the RTP/SCS represent a menu of options that local jurisdictions may consider at their discretion to successfully implement the SCS. While the RTP/SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, local jurisdictions maintain local land use authority.
068-23	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 119: SCAG indicates that the policies of its Compass Blueprint program will be used to determine consistency of private development and	Comment noted. Transit projects with obligated funding from state or federal sources will not have those funds de-obligated as a result of any adopted SCS. As stated in Chapter 4, the

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			public infrastructure projects with the SCS. A statement should be added that will clarify whether or not a project that is determined to be inconsistent with the policies of the SCS (i.e, Compass Blueprint) will be deemed ineligible for transportation funding.	Compass Blueprint principles and preceding land use advisory policies served only as a foundation for the overall regional land use development pattern. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.
068-24	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 148: Throughout the document the RTP is described as having "growth inducing impacts." In past iterations of the RTP, its purpose was to mitigate the impacts of growth. If transportation projects identified in the RTP are seen as inducing growth, then the lead agency may be required to mitigate the impacts of perceived subsequent related growth.	Comment noted. Clarifying language has been provided in the final RTP/SCS to address this comment.
068-25	Thomas Mauk	County of Orange	There are several terms contained throughout the RTP/SCS and PEIR that need to be clearly defined including the following: - Urban Growth Boundary - References to benchmarks - SCRIP - Gentrification - Open space - Parking Cash Out - Smart growth principles - Active Transportation - Greenfield	Comment noted. These terms have been added to the glossary.
068-26	Thomas Mauk	County of Orange	The alternatives discussed in the RTP/SCS, PEIR and SCS Background Document have been inconsistently named. The alternatives are labeled either: 1, 2 and 3, or A, B and C. The appropriate name should be determined for each and these documents revised to ensure consistency.	Comment noted. For purposes of plan evaluation and for the PEIR, SCAG developed alternative development patterns that were alternately closer to the past trends (with a more dispersed development pattern and a higher proportion of single-family homes compared to multi-family) or more aggressively shifted toward in-fill and TOD (Envision2). These PEIR alternatives are similar, though not identical, to the alternatives developed for plan evaluation, and therefore did not use the same names. In particular, the PEIR alternatives used the same growth and land use assumptions as the Plan Alternatives, but did not include project and network components at the same level of detail.
068-27	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Pages 82-83: The RTP/SCS describes the following measures contained in the "water resources mitigation program:" 1. "Utilizing advanced water capture and filtration techniques, showing a preference for naturalized systems and designs to control stormwater at the source;" 2. "Avoiding any new construction of impervious surfaces in non-urbanized areas, such as wetlands, habitat areas, parks and near river systems;" 3. "Avoiding any new construction that provides access to flood-prone areas, such as alluvial fans and slide zones;" and 4. "Expansion of (natural flood control systems, such as wetlands and riparian buffers) in	Comment noted. Pursuant to federal transportation planning requirements, metropolitan long-range plans must include a discussion of potential environmental mitigation activities including activities that may have the greatest potential to restore and maintain the environmental functions affected by the RTP. As such, the RTP includes a discussion of environmental mitigation measures in order to comply with this requirement. Additionally the final RTP/SCS PEIR includes a list of example measures lead agencies may consider at their discretion to reduce project-specific environmental impacts. For additional response, please see the Final PEIR to the 2012-2035

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			areas where they do not currently exist". It is unclear how such measures would be implemented if they are included in this document. If they are to be viewed by local jurisdictions as either goals or suggested policies, they could be implemented on that basis to the extent they were deemed feasible in any given case. On the other hand, if listing such measures indicates they are deemed reasonable and feasible to be applied by municipalities in all new road projects, that is quite another matter and not supportable. For example, while it may be desirable to utilize advanced water capture and filtration techniques, there is little documented experience with engineered on-site capture and filtration to support a preference for "naturalized systems and designs" in every case. Similarly, the strongly worded measures against new construction in wetlands, habitat areas, parks, near river systems, and flood-prone areas may be desirable, but should not constitute an outright prohibition, with hundreds of vacant, older but long-established legal building sites situated in such settings. The word "any" should be removed from the mitigation measures to address these concerns. Finally, the suggested expansion of natural flood control systems, such as wetlands and riparian buffers, in areas where they do not currently exist is supportable, as long as it does not in any way mandate removal of existing engineered channel stretches as "mitigation" for road-building. In many cases, the only reason a new road can be built at all is that engineered channels have reduced flood hazards to that area.	RTP/SCS, Chapter 4, Responses to Comments on the Draft PEIR Letter Number 34. The mitigation section of the 2012-2035 RTP/SCS has been revised to clarify that mitigation at the project level is at the discretion of lead agencies.
068-28	Thomas Mauk	County of Orange	Chapter 4-Sustainable Communities Strategy, Page 110: One of the "Benefits to Public Health and the Environment" regards municipal water and sewer systems. The statement " ... concrete stormwater channels harm water quality and sprawl eats into open space" is misleading, and is subject to Regional Water Quality Control Board regulations that vary by region. The following alternative language is suggested: Public health and environmental protection have long been linked to the way our region is planned and the way public services are delivered. Municipal water and sewer systems, for example, ensure clean water. At the same time, [delete]concrete stormwater runoff channels harm water quality[/delete] [add]as areas become more urbanized and the percentage of impervious surface is	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.

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			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 freguency, 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 contained in the RTP/SCS will provide widespread benefits within the region for both public health and environmental protection.	
068-29	Thomas Mauk	County of Orange	Programmed Commitments, Page 2, Table 1: With respect to Orange County, Sample Major Highway Projects listed in Table 1 for in the FTIP identify improvements to I-5 (HOV Lanes from South of Avenida Pice to South of Avenida Vista, completion year 2020) and I-405 (Mixed Flow Lanes from SR-73 to I-605, completion year 2018). It is presumed that Caltrans is lead on these projects and there is no local match/investment requirement.	Comment noted. FTIP projects for Orange County are submitted to SCAG by the Orange County Transportation Authority (OCTA), which is responsible for providing project information including funding levels and sources. This information, along with lead agency identification, is published in the FTIP documentation available at http://www.scag.ca.gov/ftip/index.htm.
068-30	Thomas Mauk	County of Orange	Programmed Commitments, Page 3, Table 2: In Table 2, additional county commitments are identified. Therein, there is reference to: 1. HOV Lanes- Reconfiguring the Avenida Pico Interchange at the I-5 in San Clemente- completion year 2014. 2. Toll Lanes- Constructing HOV/HOT connectors for SR-91/SR241 –completion year 2018. 3. Mixed Flow Lanes - Reconfiguring the interchanges at Avery Parkway and La Paz in Mission Viejo - completion year 2020. There is also mention of improving the interchange at SR-91/SR-55 and Lakeview Avenue in Anaheim- completion year 2023. It is presumed that Caltrans is lead on these projects and there is no local match/investment requirement. (These projects are not listed in OC Public Works/7-year Transportation Capital Improvement Program, BOS Approved on 6-28-2011.)	Comment noted. FTIP projects for Orange County are submitted to SCAG by the Orange County Transportation Authority (OCTA), which is responsible for providing project information including funding levels and sources. This information, along with lead agency identification, is published in the FTIP documentation available at http://www.scag.ca.gov/ftip/index.htm.
068-31	Thomas Mauk	County of Orange	Page 2, Federal Transportation Improvement Program (FTIP) Project List: 1. FTIP ORA120357- Orange County, Traffic signal Synchronization for Bus Rapid Federal Transit Corridors, Route 0 • Is funding tied to OC Public Works/Road's Antonio Parkway Corridor Traffic Signal Synchronization programmed for FY	Comment noted. FTIP projects for Orange County are submitted to SCAG by the Orange County Transportation Authority (OCTA), which is responsible for providing project information including funding levels and sources. This information, along with lead agency identification, is published in the FTIP documentation

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			2012-13? Coordination between Program OCTA and OC Public Works/Road is recommended. 2. FTIP ORA120326 Route 5 and FTIP ORA000152, FTIP 120506 and ORA120507 on Route 74 • Comment/Question: Is funding tied to OC Public Works/Road's La Pata Avenue (Engineering) and La Pata Avenue NEPA (permitting) projects programmed for FY 2011-12, Pata Avenue Land Acquisition programmed for FY 2012-13 and La Pata Avenue (construction) programmed for FY 2013-14? 3. FTIP 2A0804 and ORA082401 Route 0, Cow Camp Road from FTC to Ortega • Is funding tied to OC Public Works/Road's Cow Camp Road Segment 1 (Engineering) programmed for FY 2011-12, Cow Camp Road- Segment 1 (Construction) and Cow Camp Road Segment II (Engineering) programmed for FY 2012-13, and Cow Camp Road- Segment II (Construction) programmed for FY 2013-14 4. FTIP ORA82406 Antonio Parkway Build Out between Ladera Planned Communities to Ortega Highway • Not shown listed in OC Public Works/? -year Transportation Capital Improvement Program, BOS Approved on 6-28-2011. 5. FTIP ORA120505 Alton Parkway Improvements -Irvine Blvd to Commercentre Drive • Not shown listed in OC Public Works/? -year Transportation Capital Improvement Program, BOS Approved on 6-28-2011. • Coordination with County required - Adjacent to James A Musick Branch Jail	available atComment noted. http://www.scag.ca.gov/ftip/index.htm. Questions about FTIP project information should be directed to OCTA, and any needed changes should be submitted by OCTA to SCAG in accordance with established FTIP development procedures.
068-32	Thomas Mauk	County of Orange	Page 2, Federal Transportation Improvement Program (FTIP) Project List (continued): 6. FTIP ORA 120523 on Route 0, Placentia- Richfied Ave. -Atwood Channel Bridge Widening • Coordination with OCFCD required. 7. FTIP ORA020826 on Route 0, Tustin Ave/rose Drive Grade Separation • Coordination with County and OCFCD required. 8. FTIP ORA100603 on Route 0, Santa Ana River Trail • Coordination with OCFCD required. 9. Financially-Constrained RTP Projects, 210 10. RTP ORA 120357 Orange County Traffic signal Synchronization for Bus Rapid Transit Corridors- see FTIP Projects above 11. RTP ORA120326 Route 5- see FTIP Projects above 12. RTP ORA 120523 Richfield Avenue- see FTIP Projects above, completion FY 2012 13. RTP 2A0705 Signal Synchronization Program -see FTIP ORA 120357 above, completion FY 2035 14. RTP 2L220 Non-motorized, completion FY 2035 • No projects are identified in OC Public Works/Road 7 year CIP. 15. RTP 2A0804 Cow Camp Road, completion FY 2018- see FTIP Projects listed above Laguna	Comment noted. FTIP projects for Orange County are submitted to SCAG by the Orange County Transportation Authority (OCTA), which is responsible for providing project information including funding levels and sources. This information, along with lead agency identification, is published in the FTIP documentation available at http://www.scag.ca.gov/ftip/index.htm. Questions about FTIP project information should be directed to OCTA, and any needed changes should be submitted by OCTA to SCAG in accordance with established FTIP development procedures.

ID	Name	Affiliation	Comment	Response
			Canyon Road Projects identified in OC Public Works 7 year CIP for FY 2011-12 (SR-73 to I-405 and SR-73 to El Taro Road) were not identified in the report nor was that for the El Taro Road widening from Glen Ranch Road to Live Oak Canyon currently programmed for FY 2014-15.	
068-33	Thomas Mauk	County of Orange	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 34.
069-01	Andrew Mack	DesertXpress Enterprises, LLC	Chapter 1: Vision, page 21. Passenger and High Speed Rail - Request adding a discussion of DesertXpress. Although included in the Strategic Plan, as a federally licensed and approved interstate passenger railroad, DesertXpress will help to achieve the vision for high speed passenger rail in Southern California.	Comment noted.
069-02	Andrew Mack	DesertXpress Enterprises, LLC	Chapter 2: Transportation Investment, page 44. Strategically Expanding our System - Suggest adding language describing that by diverting automobiles, high speed rail increases the goods movement capacity of the freeway system.	Comment noted. To the extent that high-speed rail diverts automobile trips, any roadway capacity that becomes available from this diversion would be available not only for goods movement (trucks) but for many types of vehicles, including automobiles and buses.
069-03	Andrew Mack	DesertXpress Enterprises, LLC	Chapter 2: Transportation investments, page 50. Passenger and High Speed Rail - Request adding that a connection to the DesertXpress system between Victorville and Palmdale would effectively expand passenger rail service providing interstate high speed rail connectivity.	Comment noted.
069-04	Andrew Mack	DesertXpress Enterprises, LLC	Chapter 2: Transportation investments, page 52. Rail Policies - Suggest adding language to explain that DesertXpress is committed to building an interoperable system and welcomes the support of SCAG in working with us to ensure that interoperability between systems is achieved. The MOU between SCAG, LAMETRO, CAHSRA, SANBAG, SANDAG etc. should be referenced.	Comment noted. The Memorandum of Understanding is discussed on pages 11 and 16 of the Passenger Rail Appendix. SCAG supports working with DesertXpress, CHSRA and other rail providers to work on interoperability issues.
069-05	Andrew Mack	DesertXpress Enterprises, LLC	Chapter 4: Sustainable Communities Strategy, page 106. Table 4.4: Transportation Network Actions and Strategies - Suggest including language in table to encourage connectivity with DesertXpress.	Comment noted.
069-06	Andrew Mack	DesertXpress Enterprises, LLC	Chapter 7: Strategic Plan, page 201. Chapter 7: Strategic Plan - Suggest adding electrified passenger rail in addition to freight rail as a strategy for emission reduction.	Comment noted.
069-07	Andrew Mack	DesertXpress Enterprises, LLC	Chapter 7: Strategic Plan, page 204. Ultimate Vision for a High-Speed Rail System - Suggest adding more detail regarding DesertXpress. DesertXpress is a Federally approved and licensed	Comment noted. This comment has been addressed in the Passenger Rail Appendix.

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			high speed passenger railroad that connects Las Vegas with Southern California. With its Southern California station initially in Victorville, an extension of DesertXpress to Palmdale, 50 miles West, would provide for a cross platform connection to the Metrolink commuter rail system with station stops throughout Southern California. Fully interoperable high speed service would be achieved over the California high speed rail project or upgraded Metrolink system. Environmental work has already begun to analyze and clear the rail connection between Victorville and Palmdale as part of the High Desert Corridor project. The High Desert Corridor Joint Powers Authority (comprising San Bernardino County, Los Angeles County, City of Adelanto, City of Hesperia, City of Palmdale, and City of Victorville) passed resolutions of support for DesertXpress in May 2010 and June 2011. The DesertXpress project specific EIS is complete with the following Federal actions: July 8, 2011: Federal Railroad Administration Record of Decision (ROD) October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity. October 31, 2011: Bureau of Land Management ROD November 18, 2011: Federal Highway Administration ROD On December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land. Application for a federal loan under the Railroad Rehabilitation and Improvement Financing program currently under review by US Department of Transportation.	
069-08	Andrew Mack	DesertXpress Enterprises, LLC	Supplemental Report: Aviation and Airport Ground Access, page 112. 2.3.2 Role of California High-Speed Rail System in Regional Airport Ground Access - Suggest adding discussion of potential for DesertXpress connection at the Palmdale Airport.	Comment noted.
069-09	Andrew Mack	DesertXpress Enterprises, LLC	Supplemental Report: Passenger Rail, page 8. Table 2: High Speed Rail Matrix - Suggest revising as follows: PROJECT: DesertXpress PROJECT DESCRIPTION: Las Vegas to Victorville with no intermediate stops generally along I-15 corridor. Phase 2 would connect Victorville with Palmdale. Top speed of 150 MPH using Tier III compliant electric multiple unit trains. PROJECT READINESS: Project specific EIS is complete and federal interstate operating license has been issued. July 8, 2011: Federal Railroad Administration Record of Decision (ROD). October 26, 2011: Surface Transportation Board issued	Comment noted. The Final RTP has been edited to incorporate this comment.

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			Certificate of Public Convenience and Necessity authorizing DesertXpress as an interstate railroad. October 31, 2011: Bureau of Land Management ROD. November 18, 2011: California and Nevada Federal Highway Administration RODs. December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land. PROJECT CONSENSUS: High - as evidenced by the completed NEPA process, agreements in place with the State of California, Certificate of Public Convenience and Necessity from the Surface Transportation	
069-10	Andrew Mack	DesertXpress Enterprises, LLC	Supplemental Report: Passenger Rail, page 18. the Strategic Plan: Our Ultimate Vision for High Speed Rail - Suggest adding DesertXpress and connection to California High Speed Rail and upgraded Metrolink service as a key component of the Ultimate Vision for High Speed Rail.	Comment noted. The Final RTP has been edited to incorporate this comment.
069-11	Andrew Mack	DesertXpress Enterprises, LLC	Supplemental Report: Passenger Rail, page 19. Strategic Plan Projects - DesertXpress is a Federally approved and licensed high speed passenger railroad that connects Las Vegas with Southern California. Travelling between Las Vegas, NV and Victorville, CA at a top speed of 150 MPH, DesertXpress will use next generation steel wheel on steel rail fully electric high speed trains. There are no intermediate stops. The DesertXpress project specific EIS is complete: · July 8, 2011: Federal Railroad Administration Record of Decision (ROD) · October 26, 2011: Surface Transportation Board issued Certificate of Public Convenience and Necessity. · October 31, 2011: Bureau of Land Management ROD · November 18, 2011: Federal Highway Administration ROD · On December 7, 2011, DesertXpress executed a lease agreement with BLM for the alignment and facilities located on federal land. With its Southern California station initially in Victorville, an extension of DesertXpress to Palmdale, 50 miles West would provide for a cross platform connection to the Metrolink commuter rail system with station stops throughout Southern California. Fully interoperable high speed service would be achieved over the California high speed rail project or upgraded Metrolink system. Environmental work has already begun to analyze and clear the rail connection between Victorville and Palmdale as part of the High Desert Corridor project. The High Desert Corridor Joint Powers Authority (comprising San Bernardino County, Los Angeles	Comment noted. The Final RTP has been edited to incorporate this comment.

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			County, City of Adelanto, City of Hesperia, City of Palmdale, and City of Victorville) passed resolutions of support for DesertXpress in May 2010 and June 2011. Application for a federal loan under the Railroad Rehabilitation and Improvement Financing program currently under review by US Department of Transportation.	
070-01	Lars Clutterham	downeygreen	Downeygreen is a non-profit partnership advocating sustainability in the City of Downey. As such, we have actively participated in the development of this RTP/SCS over the past year, including its progress at the subregional level through the Gateway Cities COG.	Comment noted.
070-02	Lars Clutterham	downeygreen	We want to forcefully underline the need to strengthen the active transportation objectives set forth in the RTP/SCS.	Comment noted.
070-03	Lars Clutterham	downeygreen	We further support the additional commitment requested in its letter by the Safe Routes to School National Partnership, which calls for increasing the proposed RTP investment in active transportation to as much as five through eight percent of the total 2012 plan.	Comment noted.
070-04	Lars Clutterham	downeygreen	We also agree with Safe Routes to School that the RTP should equalize disbursements to active transportation over the entire course of the RTP/SCS through 2035.	Comment noted.
070-05	Lars Clutterham	downeygreen	As we stated at the public hearing on February 2, the City of Downey, in the heart of the SCAG region, is a city locked into the transportation and land use culture of the 1950's and '60's. Despite giving lip service to developing bicycle transportation in its current General Plan and in its 2010 Downtown Specific Plan (which received a Compass Blueprint Award), the City of Downey offered no contribution to the active transportation projections of the Gateway Cities COG sub-regional SCS through 2035.	Comment noted.
070-06	Lars Clutterham	downeygreen	Moreover, the City of Downey has just approved a major shopping center development which, according to current plans, prioritizes the automobile and lacks transit access. Therefore, we feel it is especially important that SCAG continue to show strong leadership in promoting the necessary evolution to new transportation paradigms in southern California.	Comment noted.
070-07	Lars Clutterham	downeygreen	The Draft RTP/SCS includes one very brief appendix on Vehicle Technology which mentions Electric Vehicles. Yet Southern California Edison projects between 400,000 and one million	Comment noted. Chapter 4, Sustainable Communities Strategy, includes a discussion of Regional and Local Efforts to Adopt Clean Vehicle Technology. Specifically, it states that , "in

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			Electric Vehicles in the region by 2020. We believe some mention of EV technology should be made in the body of the 2012 RTP/SCS, and we hope that SCAG will begin to plan to promote the development of an EVSE infrastructure in southern California for the 2016 RTP.	response to PEV market forecasts, SCAG has developed a robust work program to prepare for the influx of PEVs, in collaboration with the South Coast Air Quality Management District, Southern California Edison, Western Riverside Council of Governments (WRCOG), the South Bay Cities Council of Governments (SBCCOG) and a wide array of stakeholders." Furthermore, the SCS includes two strategies for SCAG and local governments to support and promote zero or non-zero emissions technology, including the introduction of electric and other zero-emission/near zero-emission vehicles in Southern California. SCAG is currently engaged in a collaborative process to prepare Southern California for the forecasted influx of Plug-In Electric Vehicles (PEV), which will reduce air pollution, address AB 32 and SB 375, and attract green businesses to Southern California. SCAG recognizes that a regional planning perspective is necessary to adequately address PEV Readiness. In order to better understand the on-going and planned efforts in the region, SCAG has coordinated stakeholder meetings with utilities, subregional councils of government, academia, jurisdictions and other key regional partners. SCAG has also included PEV related actions and strategies in the Draft RTP/SCS that would support and expand this effort. In June 2011, SCAG, in conjunction with our regional partners applied for two PEV planning grants and was successful in both applications. The first grant, awarded by the U.S. Department of Energy (DOE) has as its primary purpose the development of a Regional PEV Readiness Plan for Southern California. The South Coast Air Quality Management District (SCAQMD) submitted the statewide application in partnership with SCAG, the Bay Area Air Quality Management District, the Plug-In Electric Vehicle Collaborative, and Clean Cities Coalitions in California. This grant awarded $1 million to PEV Readiness efforts statewide, with $300,000 going to SCAG. The second successful grant application was awarded by the California Energy Commission (CEC) and was the result of a collaborative effort between SCAG and SCAQMD in partnership with SCE, the Western Riverside Council of Governments (WRCOG), and South Bay Cities Council of Governments (SBCCOG). This grant has been funded for $200,000. The purpose of the project is to develop two complementary

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				subregional plans in collaboration with WRCOG and SBCCOG. These subregional plans will serve as models for other subregions as they begin to develop their own PEV Readiness Plans. SCAG will continue to work with our regional partners on this new planning effort and will pursue outreach efforts to additional stakeholders as the process evolves.
071-01	Leonard Kranser	Editor, El Toro Info Site	The 2035 RTP Aviation Plan is based on assumptions that the legal restrictions on the capacity of existing urban airports - Los Angeles International, John Wayne, Bob Hope and Long Beach - will continue unchanged through 2035. Consequently, growing future demand is forecast by SCAG to be met at remote airports that have been shown to be unpopular with many passengers and air carriers. Ontario Airport has seen a substantial decline in traffic and Palmdale was unable to generate enough volume to become sustainable, even with government subsidies. The Table 2.7 2035 Airport Forecasts are unrealistic. The plan uses assumptions about levels of future demand and should also incorporate reasonable assumptions about changes in the future constraints on the urban airports. The negotiated agreements that limit the utilization of the region's most accessible airports will expire well before 2035. It is unreasonable to assume that the FAA, funding sources, airlines and the traveling public will not insist that the limits be relaxed in order to accommodate future demand. With newer, quieter and less polluting aircraft, it should become more politically acceptable to handle more flights at these existing facilities. Unrealistic assumptions about which airports will serve the region, and to what degree, may lead to unrealistic assumptions about ground access needs.	Comment noted. The 2035 regional air passenger demand forecasts in the Draft 2012-2035 Regional Transportation Plan Sustainable Communities Strategy (2012 RTP/SCS) recognizes legally-allowable and defined physical capacity constraints at constrained urban airports including LAX, Bob Hope, Long Beach and John Wayne. SCAG recognizes the fact that the settlement agreements at both LAX and John Wayne airports expire in the 2015-2020 time period, and that relaxation or elimination of the settlement agreement constraints at these airports could significantly impact forecast allocations of aviation demand at other airports in the regional system. However, it is currently difficult to determine whether these constraints will be re-established at current or higher levels, or completely eliminated after the existing settlement agreements at these airports expire. Future updates of the forecast, such as for the 2016 RTP, will incorporate any new information provided to SCAG by local airport authorities on revised constraints at capacity-constrained airports.
072-01	Connell Dunning	Environmental Protection Agency	Section 6001 Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) directs metropolitan planning organizations to consult with resource agencies while developing long-range transportation plans. It also states that long range transportation plans must include “a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan.” EPA provides the following comments in	Comment noted.

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			support of compliance with these requirements.	
072-02	Connell Dunning	Environmental Protection Agency	Environmental Justice and children ‘s Health The Draft RTP provides a summary of public involvement efforts and a thorough Environmental Justice Analysis including recommendations from the public outreach meetings. The Environmental Justice Analysis finds many potential disparate impacts on minority, low-income, and other sensitive communities. These impacts are a result of gentrification, air quality impacts, and noise. The Draft RTP provides evidence that environmental justice communities in the SCAG Region are already heavily burdened as a result of exposure to air pollution from transportation related activities. The communities will continue to be impacted with the many projects planned in the SCAG Region. Therefore, all impacts, even seemingly small ones, are important to consider and mitigate in order to offset the project related impacts to the local communities. EPA is encouraged to see that, new to the 2012 RTP, the 1 Environmental Justice Analysis considers cancer and respiratory risks and air quality impacts along freeways and highly traveled corridors. Children as Sensitive Age Group The Environmental Justice Analysis includes one age variable: population 65 years old and older. Children are another sensitive age group that should be included in the Environmental Justice analysis. Environmental contaminants may harm children more than adults. Minority and low-income children may be exposed to more pollution and therefore, may face higher health risks from exposures. An important indicator in screening for potential environmental justice concerns is the percent of the population under five years old.” 2There is a growing body of evidence that environmental justice communities are disproportionately exposed and more vulnerable to pollution impacts than other communities. 3As discussed in EPA ‘s Frameworkfor Cumulative Risk 4disadvantaged, underserved, and overburdened communities are likely to come to the table with pre-existing deficits of both a physical and social nature that make the effects of environmental pollution more, and in some cases, unacceptably, burdensome. Thus, certain subpopulations may be more likely to be adversely affected by a given stressor than is the general population. • EPA recommends that the Environmental Justice Analysis in the Final RTP, and included	Comment noted. Additional analysis will be included in SCAG’s Final Environmental Justice (EJ) Appendix that measures the health and emissions impacts for population less than five years of age. Included in this section will be the existing cancer and respiratory risk for areas with high concentrations of young children, along with projected emissions impacts from the RTP/SCS on young children for those who live within 500 feet of the region’s freeways and highly traveled corridors.

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			health analyses, include percent of the population under five years old as a variable to elucidate how young children in environmental justice communities will be impa	
072-03	Connell Dunning	Environmental Protection Agency	Environmental Justice Mitgation Toolbox The Draft RTP provides an Environmental Justice Mitigation Toolbox with recommended mitigations for noise impacts, air quality, rail related impacts, and road pricing mechanisms. The mitigations are recommendations and are not required through the Draft RTP. The Draft RTP uses the language that the project sponsors should “to the extent feasible and practicable” apply these mitigations to the project. The recommended mitigations are critical to protecting the health of the environmental justice communities in the SCAG region. EPA recognizes the importance of these mitigations and recommends that the project sponsors not only apply these mitigations but also seek out further recommendations from the affected community. The current mitigation toolbox provides a list of broad mitigations that are specific to project construction and implementation. • Community identified mitigations could include more holistic approaches to protecting health including: o Fund proactive measures to improve air quality in neighboring homes, schools, and other sensitive receptors; o Provide public education programs about environmental health impacts to better enable residents to make informed decisions about their health and community; and o Engage in proactive measures to train and hire local residents for construction or operation of the project to improve their economic status and access to health care. • EPA also recommends that the list of available air quality tools in the Environmental Justice Toolbox - Air Quality Impacts be revised to include near-term advanced technology deployment measures, such as: o zero emissions heavy-duty trucks (20 13+); o Tier 4 marine engine repowers and replacements (20 14+); and o Tier 4 and zero emissions railyard equipment (2015+). o See http://www.dieselnet.com/standards/us/marine.php and http://www.dieselnet.com/standards/us/loco.php. Future Project-level Environmental Justice Analyses Additionally, the Environmental Justice Appendix provides detail on how the Environmental Justice Analysis was performed, with the analysis conducted with input from the community. • EPA recommends	Comment noted. SCAG will provide additional mitigation details in the both the EJ appendix and in the PEIR as it relates to air quality impacts. Please refer to section 3.2 of the PEIR, which outlines more potential mitigation measures to reduce the air quality impacts of transportation and development projects throughout the region. In the future, community identified mitigation programs may also be featured in SCAG's planning initiatives as a means for reducing the health impacts of air quality and emissions on the population-at-large. SCAG is committed to improving the quality of life for Southern Californians and will continue to research various approaches to environmental mitigation in the future.

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			that the Final RTP acknowledge that project sponsors should provide a similar level of analysis to identify the Environmental Justice impacts of each project. With consistency in analysis and meaningful involvement from the affected community, mitigation measures can be identified to best address the project's impacts.	
072-04	Connell Dunning	Environmental Protection Agency	Sustainable Communities Strategy and Regional Zero Emissions Freight System The Draft RTP recognizes that that SCAG region has substantial mobility and air quality challenges, with the most congested roadways in the nation and the worst air quality in the nation. The Draft RTP also identifies its region as the largest international trade gateway in the U.S., supported by marine ports, air cargo facilities, railroads, regional highways and state routes. SCAG has a great opportunity to face these challenges with planning efforts that are underway to establish a regional zero emission freight system and the RTP's inclusion of a Sustainable Community Strategy (SCS), intended to reduce greenhouse gas (GHG) emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. • EPA encourages SCAG to use the current needs for efficient and cleaner freight movement as a catalyst for initiating the most advanced technological solutions to freight movement, including zero emissions technologies, in this transportation planning effort. Part of SCAG's Regional Zero Emissions Freight System includes a system of truck-only lanes extending from the San Pedro Bay Ports to downtown Los Angeles along the 1-7 10, connecting to an east-west segment, and finally reaching the 1-15 in San Bernardino County. Truck-only lanes add capacity in congested corridors, improve truck operations and safety by separating trucks and autos, and would provide a platform for the introduction and adoption of zero-emission technologies. The 2012 RTP identifies an East-West Freight Corridor concept (Exhibit 2.9 Potential East-West Freight Corridor shows lanes along the 1-710, SR 60, and 1-15 to just north of 1-10), carrying between 58,000 and 70,000 trucks per day, with trucks removed from adjacent general purpose lanes and local arterial roads.	Comment noted.
072-05	Connell Dunning	Environmental Protection Agency	SCAG's SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors,	Comment noted. The estimation of induced demand is not an established science and some of it is addressed in our analytical tools and models. However, overall, the benefits of highway

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			resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. EPA is pleased to see that the RTP provides a greater investment in transit projects and an allocation of over $6 billion for active transportation projects, a 200-percent increase from the 2008 RTP. EPA supports the investment of a greater share of transportation resources to promoting public transit and other alternative modes instead of facilitating single-occupant vehicle use. Efforts to expand transit service, increase rideshare, and integrate bicycle and transit nodes offer the opportunity to support the region's goal of reducing growth in vehicle miles traveled (VMT) and in turn, improve air quality. The emphasis on planning for additional housing and jobs near transit will also assist in decreasing VMT and related pollutant emissions. While intended to relieve congestion, freeway capacity expansion projects such as truck-only lanes and HOV/Toll Lanes, may have initially beneficial congestion relief that erodes over time, potentially resulting in increased VMT and auto emissions. • Since the RTP includes several projects that expand freeway capacity, EPA recommends that the Final RTP include a discussion of induced travel to ensure that these projects do not counter the very VMT and emission benefits expected from SCAG's SCS and Regional Zero Emissions Freight System.	capacity projects are found in the reduction of projected increases in congestion. The 2012 RTP identifies a multi-modal strategy that incorporates transit, highway, and active transportation strategies as well as demand management and congestion pricing strategies to achieve overall improved system performance. SCAG will consider including a discussion of induced demand in future RTP updates.
072-06	Connell Dunning	Environmental Protection Agency	Technologies for Transportation Investments This section of the plan cites several compelling strategies, which presumably will result in significant emissions reduction. However, the Draft RTP does not clearly outline what the requisite technologies are in relation to emissions standards for the relevant source categories. • EPA recommends including clearer descriptions of the technologies listed in the Transportation Investments section of the RTP. Definition of "clean truck" EPA suggests defining the term "clean truck" in relation to current vehicle emissions standards. This term is listed in the Vision and Transportation Investments sections of the RTP, as well as in the Goods Movement supplemental report. One option for defining this technology would be to compare its emissions to the EPA 2010 heavy-duty truck standard.	Comment noted. Further clarifications have been provided as appropriate for RTP documentation purposes, however, additional details as suggested are included in technical task reports for SCAG's Comprehensive Regional Goods Movement Plan and Implementation Strategy.
072-07	Connell Dunning	Environmental Protection Agency	Measuring Environmental Results of the RTP The Draft RTP has identified criteria pollutant and greenhouse gas emissions as its sole performance measure and indicator for environmental	Comment noted. The performance measures portion of the 2012-2035 RTP/SCS has been developed through extensive participation and input from stakeholders in the region, as well

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			quality. Given that the region has experienced significant losses to species and habitat from development encroachment and transportation construction, EPA encourages SCAG to consider sensitive habitat as a performance standard and indicator for environmental quality when updating the RTP. • EPA recommends SCAG consider demonstrating the RTP' s effectiveness at protecting species, wildlife or wetland habitat, and/or open space. If additional performance standards are not possible during the 2012 RTP update given the already extensive efforts to develop the identified performance outcomes and measures, the Final RTP should describe if there are appropriate performance standard surrogates, such as land consumption under Location Efficiency, to measure the RTP's success in protecting sensitive habitat.	as collaboration with other large MPOs in the state. For example, to facilitate the dialogue and development of performance measures for the 2012-2035 RTP/SCS, a Performance Measures Subcommittee was established in May 2011. The Subcommittee met and gathered extensive input from various stakeholders and provided recommendations to the Plans and Programs Technical Advisory Committee for further discussions prior to forwarding to the Policy Committees. As a result of the input process and deliberations, over 20 new performance measures have been added to the RTP/SCS including new categories such location efficiency. In addition, performance measures are also developed in two types based on their intended uses: one for alternatives evaluation and the other for on-going monitoring. Building on this progress, staff will continue investigating additional performance measures including the measures suggested by EPA for future plan updates.
072-08	Connell Dunning	Environmental Protection Agency	RTP Environmental Mitigation Program SAFETEA-LU Section 6001 requires long range transportation plans to include a discussion of potential environmental mitigation activities and potential areas to carry out these activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan. The Draft RTP acknowledges that the PEIR includes three categories of mitigation measures (regional, local, and project-specific, as described on p.76); however the Draft RTP identifies a separate, broad strategy to link transportation planning to the environment, such as planning transportation routes to avoid and minimize a number of biological impacts and regional mitigation strategies such as mitigation banking, improving! retaining habitat linkages, preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. The Draft RTP notes that maps of protected and unprotected areas, representing SCAG's open space infrastructure (from SCAG's 2008 Regional Comprehensive Plan), will be updated as a function of post-RTP planning efforts, that areas that are "unprotected" could be possible locations for mitigation, and that SCAG will continue to work with its regional partners to help facilitate conservation. • While EPA is supportive of many of the broad mitigation	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, based on input from a wide variety of stakeholders. It is SCAG's intent to defer to the county transportation commissions and other local agencies to determine the best conservation mechanism for its region with appropriate public input and guidance from the resource and permitting agencies. SCAG welcomes input from EPA in this post-RTP strategic planning process.

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			strategies identified, EPA recommends that the environmental mitigation discussion in the Final RTP incorporate specific information from the Regional Comprehensive Plan that will inform regional avoidance and minimization strategies when planning regional transportation networks and possible locations for mitigation. • The Final RTP should also provide additional information on post-RTP comprehensive and conservation planning efforts and describe how anticipated outcomes and products will be incorporated into long-term planning for transportation infrastructure.	
072-09	Connell Dunning	Environmental Protection Agency	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 93.
073-01	Gwenn Norton-Perry	Four Corners Coalition	The Four Corners Coalition has a 20 year history of supporting regional solutions to the transportation challenges that occur in the heart of Southern California. The jurisdictional coordination where four of your six counties come together can be a challenge. We are very pleased with the cooperation that has occurred in the region over the past several years and the continuing efforts that are represented in the Regional Transportation Plan (RTP). For example: the Universal Transit Fare Cards (Smart Cards)are the exact type of regional alignment that is necessary for increasing the overall effectiveness of our transportation system. We would suggest that the various TSM strategies capture the essence of this by adding such phrases as: Multi jurisdictional traffic signal synchronization, and Region wide advanced traveler information, Multi agency improved data collection	Comment noted.
073-02	Gwenn Norton-Perry	Four Corners Coalition	We also support the principles outlined by the Global land use and Economics committee of SCAG: Provides Positive Economic Impacts – Pro Economic Growth and Job Creation Provides Local Control: Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority o Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use and transportation Is CEQA Compliant and Defensible – The RTP/SCS is built to withstand a CEQA Challenge Is Balanced – The plan's call for New Revenue is balanced with Performance Measures, Reforms and Guarantees that assure the RTP is Effective,	Comment noted. We agree that accountability is a critical consideration for any new revenue source. The RTP does not assume nor would it result any changes in control of transportation revenues that would diminish local transportation agency/authority powers nor provide any new powers to SCAG. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall

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			Efficient and Responsible Align the plan investments and policies with improving regional economic development and competitiveness. Avoid costly projects like a light rail desert connect that helps move money out of the southern California region to Nevada and does not address the immediate needs of the region's existing transportation needs. Maximize the productivity of our transportation system. Look at peak time pricing and transportation demand management (TDM) cost recovery approach.	protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
073-03	Gwenn Norton-Perry	Four Corners Coalition	We continue to support the improvements to those freeways that carry significant intra-county traffic flow: SR 71, SR 57 up to and including the SR 60 / SR 57 intersection, SR-91, I-15, I-10. The following improvements are listed: SR-71-Addition of one HOV lane in each direction from I-10 to SR-60 • SR-71-Addition of one HOV lane in each direction from I-10 to SR-60 • SR-91-Addition of one HOV lane in each direction from Adams to SR-60/21 • I-10-Addition of one HOV lane in each direction from Haven to Ford • Addition of HOT lanes on I-10 • SR-91-Convertion of HOV lanes to tolled express lanes and addition of direct connector • SR-91-Addition of one eastbound mixed-flow lane from SR-91/55 connector to SR-241 and one westbound mixed-flow lane from SR-241 to Imperial Highway • SR-91-Addition of one mixed-flow lane in each direction at various locations from SR-241 to Pierce Street • I-15 Construction of New Schleisman Rd IC and ramps with a NB/SB Auxiliary lane between Schleisman Rd IC and Limonite Rd IC. • SR-71- Pine Avenue connector from the SR-71 off-ramp to Pine/Schleisman Road for convertibility to the I-15, through Chino and Eastvale	Comment noted.
074-01	Constance Spenger	Friends of Coyote Hills	Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). Friends of Coyote Hills is based in Fullerton, and our mission is to permanently protect all 510 acres of West Coyote Hills, one of the last remaining natural open spaces in north Orange County, from development through acquisition, to ensure a lasting public park for recreation and enjoyment. Our organization includes support from 20,000 residents in Orange	Comment noted.

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			and Los Angeles Counties. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR). We are so pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is a remarkable first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.	
074-02	Constance Spenger	Friends of Coyote Hills	Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of critical habitat to mitigate impacts related to future transportation projects" [emphasis added]. We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands." Because this program is directly tied to the implementation of transportation projects there is a clear connection to the County Transportation Commissions (CTCs). We do however, respectfully request that conservation-focused organizations and conservation focused state agencies, conservancies, and joint power authorities be included in the discussions regarding setting priority conservation areas. For example, Friends of Coyote Hills has specific knowledge about lands and linkages in and near West Coyote Hills. We offer our expertise to you during this process. In addition, we also believe targeted outreach efforts in each of the SCAG counties would create an open and transparent process for setting priorities. This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (page 128 of the Draft 2012 RTP/SCS).	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources among a wide variety of stakeholders. The intent is to include all applicable protected areas. Language has been clarified.
074-03	Constance Spenger	Friends of Coyote Hills	Locations for Mitigation (pg. 78 of the Draft 2012 RTP/SCS) On page 78 of the Draft 2012 RTP/SCS , the document mentions the	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space

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			2008 Regional Comprehensive Plan that inventoried protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park and recreation areas. We were pleased that SCAG completed this Plan showing what areas are protected and critical to maintaining functioning habitat reserves. We agree that the planning efforts SCAG undertakes in the future should involve updating the maps, but recommend expanding the language in this section to include all forms of protected lands. By limiting the acquisition and management opportunities of conservation lands to just Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) areas, decisions about priority conservation areas will be misinformed. In fact, it no longer demonstrates a comprehensive plan because of the limited scope (of pre-established mitigation sites, which are likely unrelated to transportation projects). Protected areas (e.g., National Forests, State Parks, Regional Parks, etc.) not in an NCCP/HCP are excluded from the big picture, yet they have extensive benefits to the entire open space system and often times link important habitat areas throughout the region. Consequently, we recommend having this updated map and mitigation site locations expanded to include more than just NCCP/HCP areas and instead include all levels of protected lands (federal, state, regional, and local).	resources. The intent is to include applicable protected areas, not just NCCP/HCP areas, based on input from a wide variety of stakeholders. Language has been clarified.
074-04	Constance Spenger	Friends of Coyote Hills	We hope you utilize the experience and expertise of already-established programs in both Orange and San Diego Counties. The language, as it exists now ("achieved through already-established programs") implies no other transportation agency in the region can adopt or implement an advanced mitigation program. We recommend rephrasing this sentence to be more clear about the eligibility of transportation agencies and utilizing the experience existing regional programs.	Comment noted. The intent of the conservation policy is to build upon already-established programs, with appropriate input from stakeholders. Language has been clarified.
074-05	Constance Spenger	Friends of Coyote Hills	On page 79 of the Draft 2012 RTP/SCS we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions. We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.

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			populations in perpetuity. Unfortunately, we noticed the lack of inclusion of wildlife linkages in this section. Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.	
074-06	Constance Spenger	Friends of Coyote Hills	Renewed Measure M in Orange County incorporated language that demonstrates a net environmental benefit in conjunction with a net benefit in the delivery of transportation improvement projects. Some of the environmental benefits include: landscape level acquisition, restoration, and management. Some of the transportation benefits include: streamlined permitting, involvement of the resource and permitting agencies, and reduced project delays. We believe there is an opportunity to incorporate similar "net environmental benefit/net benefit of transportation projects" language in the Draft 2012 RTP/SCS. To that end, we recommend the language from the Orange County Transportation Authority's Ordinance #3 Section 2, Item A.5.iii (page B-5) as a starting place.	Comment noted. It is SCAG's intent to defer to the CTCs to determine the best conservation mechanism for its region with appropriate public input and guidance from the resource and permitting agencies.
074-07	Constance Spenger	Friends of Coyote Hills	We appreciate SCAG's effort to create a strategic planning process that would document important conservation lands in the region. We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.	Comment noted. A Greenprint is one possible option for the mitigation program that will be discussed with a wide variety of stakeholders in the future.
075-01	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). Friends of Harbors, Beaches, and Parks (FHBP) is based in Newport Beach and we work to protect the natural lands, waterways, and beaches of Orange County. Our organization includes support from more than 80 conservation and community groups in the regional and thousands of Orange County residents. FHBP would like to applaud SCAG's efforts to include a regional advanced mitigation component in the RTP/SCS. This letter serves to offer suggestions mainly to strengthen this component, which closely links with the	Comment noted.

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			sustainability principle listed in the document's vision statement. We do, however, offer a few other suggestions as it relates to other projects we are interested in.	
075-02	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Active Transportation (p. 21 of the Draft 2012 RTP/SCS) In 2011, FHBP completed a study documenting the Walk Score for the city hall of each Orange County city as well as the city-wide average. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for walking. According to its website, WalkScore.com uses Google maps to compute the distance between residential addresses and nearby destinations. The algorithm looks at 13 categories and awards points for each between ¼ to 1 mile. Amenities within ¼ mile receive maximum points, while no points are awarded for amenities further than one mile. The categories include grocery store, coffee shop, movie theatre, park, bookstore, drug store, clothing and music store, restaurant, bar, school, library, fitness, and hardware store.1 See attachment #1 for the results of this Walk Score study. Recommendation #1 We recommend utilizing this tool as a measurement of how and where walkable, bikable communities may be most relevant. This information may serve SCAG well in determining or prioritizing funding for more active transportation opportunities. Of course, we understand that many factors are at play including site development, existing stable neighborhoods, transit areas and more, but including as a metric how communities are doing already is helpful information to have in the overall analysis.	Comment noted. SCAG will consider the use of Walk Scores and other metrics in future planning efforts.
075-03	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Regional HOT Lane Network (p. 58 of the Draft 2012 RTP/SCS) We disagree that the Toll Road Agencies proposed extension of the 241 South be included in the Regional HOT Lane Network. The RTP includes the proposed 16-mile Foothill-South Toll Road extension, which would run through the heart of San Onofre State Beach Park, a beloved and popular recreation spot in south Orange County that serves more than 2.4 million visitors each year. Both the California Coastal Commission and the U.S. Department of Commerce have rejected the Foothill-South project on the basis of its devastating projected impacts on coastal resources. Recommendation #2 The continued inclusion of this unbuildable project as a baseline roadway changes the transportation modeling for southern Orange County transportation projects. The Foothill- South should be	Comment noted. The SR-241/Foothill South Extension is a committed Transportation Control Measure (TCM) in the RTP/SCS and is programmed in the Federal Transportation Improvement Program (FTIP). The Transportation Corridor Agencies (TCA) as the respective implementing agency is moving forward with the first segment of the SR-241 extension from Oso Parkway to the vicinity of Ortega Highway.

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			eliminated from the baseline scenario and removed from the RTP, especially since it is in the unconstrained plan of the Orange County Transportation Authority's Long Range Transportation Plan.	
075-04	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Conservation Planning Policy (p. 76 of the Draft 2012 RTP/SCS) While we wholeheartedly support the concept of the conservation planning policy, which helps demonstrate progress and safety in SAFETEA-LU requirements, however we do not agree large-scale acquisition and management of critical habitat be the only type of mitigation opportunity utilized. We note however, this may simply be a word choice issue. According to the U.S. Fish and Wildlife Service: "when a species is proposed for listing as endangered or threatened under the Endangered Species Act (Act), we must consider whether there are areas of habitat we believe are essential to the species' conservation. Those areas may be proposed for designation as "critical habitat."2 Essentially, we firmly believe there are other important natural lands deserving of conservation/preservation, but do not or may not contain a "critical habitat" designation (as defined by the Service). Recommendation #3 With this in mind, we suggest changing the reference from critical habitat to important natural lands. This comment also applies to the Resource Area and Farmland section (pg. 128 of the Draft 2012 RTP/SCS).	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources among a wide variety of stakeholders. The intent is to include all applicable protected areas. Language has been clarified.
075-05	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Engage in a Strategic Planning Process We would also like to offer that it may be an important first step to create a regional Greenprint in addition to a map of regional priority conservation areas. According to Oregon State University: "A Greenprint is a non-regulatory vision to help communities make informed decisions about land conservation, scenic values, and recreation priorities. Components include: · A comprehensive overview of important natural resources, wildlife habitat, historic sites, scenic values, and potential/existing trail connections in the region · Maps that highlight the ecological and recreation priorities of the region, while respecting property rights and creating awareness around public access · An inclusive vision to foster discussion of the diverse conservation and recreation needs of the region."3 Recommendation #4 We request a region-wide Greenprint be conducted to document the natural, recreational, agricultural, and other resources in the SCAG	Comment noted. A Greenprint is one possible option for the mitigation program that will be discussed with a wide variety of stakeholders.

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			jurisdiction as part of the conservation policy planning.	
075-06	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Identify Map Priority Conservation Areas and Engage Various Partners: While we understand the RTP is directly related to County Transportation Commissions (CTCs) we would respectfully request that conservation organizations and other related agencies, conservancies, and joint power authorities, like the Santa Monica Mountains Conservancy, Mountains Recreation and Conservation Authority, and the Wildlife Corridor Conservation Authority, be included in determining priority conservation areas and plan development. CTCs, with all due respect, do not tend to focus on conservation of natural lands. As the Orange County Transportation Authority will confirm, it relied upon many sources for establishing its priority conservation areas under the Environmental Mitigation Program of Renewed Measure M. To that end, FHBP would like to offer its assistance with Orange County's potential conservation lands as we've created a county-wide map, the Green Vision Map, that documents important conservation lands and existing privately or publicly protected lands. In addition, we believe there are similar conservation non-profit organizations and entities throughout the SCAG region that could provide useful, beneficial, and relevant information about their on-the-ground priorities. Recommendation #5 We recommend that SCAG incorporate public workshops and outreach to effectively gather information from conservation organizations and other related agencies on conservation priorities. This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (pg. 128 of the Draft 2012 RTP/SCS).	Comment noted. SCAG will continue to facilitate the input from conservation organizations. The agencies listed on page 128 only refer to data compilation related to resource area mapping for the RTP/SCS. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include input from a wide variety of stakeholders, including the groups provided in the comment.
075-07	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Locations for Mitigation (pg. 78 of the Draft 2012 RTP/SCS) We are pleased that SCAG has already inventoried the locations of the protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park, and recreation areas. We agree the maps should be updated as a function of the post-RTP planning efforts but qualify this statement with the caveat that not all of the protected, or undeveloped unprotected lands, in Southern California are within a Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) area. Recommendation #6 We recommend not only updating the maps to include more recent acquisitions in the NCCP/HCP	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, not just NCCP/HCP areas, based on input from a wide variety of stakeholders. Language has been clarified.

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			areas, but also recommend including preserved lands not in the NCCP/HCP areas. For example, most of Chino Hills State Park is not included in an NCCP/HCP but this park offers more than 14,100 acres of natural lands to the inventory. To exclude non-NCCP/HCP lands would misinform decisions about conservation priorities and exclude an entire network of preserved lands outside of, but often times critical to the functioning of, our entire open space system.	
075-08	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	In addition, the Orange County Transportation Authority has created a county-wide NCCP/HCP for its Environmental Mitigation Program. This new NCCP/HCP is above and beyond the existing NCCP/HCP areas (Central/Coastal and Southern). By limiting the view of where mitigation can occur (to only existing NCCP/HCP areas), SCAG is considerably reducing its potential mitigation sites especially in light of the broad and expansive nature of the RTP. Freeways crisscross the entire SCAG region and have impacts that cannot or may not be able to be mitigated in an existing NCCP/HCP, nor may SCAG or CTCs be able to add themselves as a partner this late in the NCCP/HCP process. Recommendation #7 Instead of dictating the conservation mechanism or program to be used by the individual CTCs, we recommend allowing the implementing CTC determine the best conservation mechanism for its region with appropriate public input and guidance from the resource and permitting agencies.	Comment noted. It is SCAG's intent to defer to the CTCs to determine the best conservation mechanism for its region with appropriate public input and guidance from the resource and permitting agencies.
075-09	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	We agree SCAG does not have the authority to purchase or manage these conservation lands, but disagree that the conservation areas will be "achieved through already-established programs." This statement limits the opportunities for conservation to just Orange County as it is the only transportation agency in the SCAG region to have an advanced mitigation component. Should you mean you will use already-established programs to build upon SCAG's efforts, we agree with this approach, but it is not clearly stated and should be revised. Recommendation #8 We recommend augmenting the statement to include not only already-established programs, but also programs that may be developed in the future or created within existing transportation measures (where appropriate). Additionally, it may be a good exercise to understand what modifying existing transportation measures to incorporate a	Comment noted. The intent of the conservation policy is to build upon already-established programs, with appropriate input from stakeholders. Language has been clarified.

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			regional advanced mitigation program would entail.	
075-10	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Types of Mitigation Activities (pg. 79 of the Draft 2012 RTP/SCS) By reducing transportation impacts to sensitive lands and encouraging smart land use decisions SCAG is moving in a direction that we believe will become the norm and an adopted policy at the statewide level–planning our transportation projects with a comprehensive mitigation program that ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Recommendation #9 We did notice the lack of mention of wildlife linkages in this section and based on our experiences in Orange County recommend their inclusion. Wildlife linkages are also an important conservation component to ensure the health of our open space areas.	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.
075-11	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	We are pleased to say that the Renewed Measure M Ordinance defines Programmatic Mitigation as “permanent protection of areas of high ecological value, and associated restoration, management and monitoring, to comprehensively compensate for numerous, smaller impacts associated with individual transportation projects. Continued function of existing mitigation features, such as wildlife passages are not included.”4 In other words, if freeway projects impact existing wildlife corridors, funding to ensure its continued function may not come from the programmatic mitigation component. In addition, the program will establish an “accounting process for mitigation obligations and credits that will document net environmental benefit from regional, programmatic mitigation in exchange for net benefit in the delivery of transportation improvements through streamlined and timely approvals and permitting” [emphasis added]. Recommendation #10 We do, therefore, recommend that maintaining existing and future wildlife corridors or linkages be included as a type of mitigation activity and that the advanced mitigation program incorporates language to ensure a net environmental benefit as there will be a net benefit in completing the transportation projects. Recommendation #11 While we recognize there are many options to how the mitigation program gets developed, we do recommend that the summary language acknowledges that the list of types of measures is not exhaustive.	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. Clarification language has been added to denote that the summary language is not exhaustive.
075-12	Melanie	Friends of	Farmland and Agricultural Resources We urge you to consider	Comment noted. Agricultural lands were part of the locations

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	Schlotterbeck	Harbors, Beaches, and Parks	adding farmland and other agricultural resources to the conservation policy. In comparing acreages of farmland in the SCAG region, there was a loss of nearly 64,000 farmland acres because of its conversion to urban uses between 2002 and 2008. There was also a 47,000 acre decline in prime statewide important and unique farmlands (as designated by the Farmland Mapping and Monitoring Program classification system).6 Urban uses generally equate to additional greenhouse gas emissions due to auto-centric developments and therefore go against the mandate of SB 375. We believe existing agricultural lands play into the larger network of open spaces. Farmlands, like natural lands, create opportunities for natural recharge of the groundwater, reduce the effects of urban heat islands, and provide refuge and foraging areas for wildlife. Of course, agricultural lands also provide food production (worth $4.6 billion per year in the SCAG region) and jobs (67,000 with an annual payroll of $800 million), while producing many times less greenhouse gases than the urban development that has been supplanting them.	previously mapped through prior planning processes as noted on page 78. Agricultural resources are also included in the list of mitigation for biological resources and open space mitigation programs. It is SCAG's intent to include agricultural lands, with appropriate public input and guidance from the resource and permitting agencies.
075-13	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	General Mapping: It unfortunately seemed to be a trend that the maps in the RTP/SCS were illegible in both printed and digital form. It would be helpful to revise the maps contained within the documents so that the public can accurately read and understand what the maps are trying to show. We were particularly interested in the following maps but our comments are limited due to readability (pixelation) issues: the projected population growth (Exhibit 4.1), housing growth (Exhibit 4.2), employment growth (Exhibit 4.3), natural resource areas (Exhibit 4.6), open space (Exhibit 4.7), and farmland maps (Exhibit 4.8).	Comment noted. Exhibits maps were developed to fit standard paper size, however high resolution maps are available upon request and were provided upon request during the comment period.
075-14	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Forecasted Growth: We applaud your goal of the RTP/SCS to focus on (among other goals): A land use growth pattern that accommodates the region's future employment and housing needs, and protected sensitive habitat and natural resource areas. We agree land use, transportation AND habitat protection can all be achieved through innovative, smart and new programs like the proposed advanced mitigation policy. We also appreciate that the land consumption of the greenfield areas consumes 408 square miles less than the baseline. And yes, we agree it is more expensive to develop in greenfield areas	Comment noted.

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			because of the lack of infrastructure and services. We are pleased to see SCAG promoting infill projects and protecting our remaining greenfields through compact development and improved land use planning. We believe these concepts are all moving in the right direction toward achieving our mutual goals and the goals outlined in the RTP/SCS for mobility, economy, and sustainability.	
075-15	Melanie Schlotterbeck	Friends of Harbors, Beaches, and Parks	Rapid Fire Model Rapid Fire Model Regional Scenarios Summary which outlines the results of the impacts of varying land use patterns, transportation investments, and policy directions on greenhouse gas emissions, air pollution, water and energy use, land consumption, and infrastructure cost is an excellent method to evaluate how decisions will impact the region. We are pleased to see SCAG utilizing this tool.	Comment noted.
076-01	Raymond Dunton	Gateway Cities Council of Governments	We understand that SCAG staff is recommending that the growth forecast be adopted at the city level rather than at the county level, which has been the practice in the past. We request that SCAG continue the past practice of adopting the growth forecast at the county level to allow for much-needed flexibility as local jurisdictions implement their general plans.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
076-02	Raymond Dunton	Gateway Cities Council of Governments	The draft Financial Plan includes over $110 billion to come from new mileage-based user fees that would be implemented to replace and augment gasoline taxes. This is the largest single element of the overall new revenue sources anticipated for the RTP. We would like additional information on how these fees might affect lower-income residents of the SCAG region, particularly since many such residents are concentrated within the Gateway Cities. The Financial Plan envisions a future split among local, state, and federal funding sources that is quite different from the current split, in which over 70% of all transportation funding is of local origin. In the future, the Plan shows 22% from federal and 25% from state, leaving only 53% from local sources. Can SCAG present a chart or plan showing how and when this transition would occur between 2012 and 2035? Table 3.4.1 presents Core and Reasonably Available local sources of revenue and includes development mitigation fees for Orange and Riverside Counties. Does the revenue estimate include any assumption of funds from the potential adoption of a development fee in Los Angeles County?	Comment noted. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. The financial plan does not assume any revenues associated with the congestion mitigation

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				fee feasibility study currently being explored by MTA as a part of a proposed restructuring of its Congestion Management Program.
076-03	Raymond Dunton	Gateway Cities Council of Governments	Exhibit 2.1 and Exhibit 4.12 show major highway projects under the Regional Transportation Plan. Some major Gateway Cities projects - notably those along I-5 between I-605 and the County line - are not indicated on these exhibits. We understand that this is because the exhibits show only Plan projects and do not show projects in the current Federal Transportation Improvement Program (FTIP). We suggest that the exhibits be amended to include FTIP projects over a certain cost threshold so as to show a more complete picture of regional highway infrastructure investments.	The HOV lane improvements on I-5 between I-605 and the County line are included in Exhibit 2.1 and 4.12, however, the mixed-flow lane improvements were left out of these maps. The mixed-flow lane improvements have been added to the maps for the Final RTP/SCS document.
076-04	Raymond Dunton	Gateway Cities Council of Governments	We understand that discussions are ongoing among SCAG, the County Transportation Commissions, and the California High Speed Rail Authority regarding levels of available funding for rail infrastructure improvements within the SCAG region. We look forward to further details about the specific investments that will be made in Southern California's rail infrastructure under the 2012 RTP, particularly those that affect the Gateway Cities.	Comment noted.
076-05	Raymond Dunton	Gateway Cities Council of Governments	Table 2.6 lists several potential routes for Express/HOT Lane development. Two of these run through the Gateway Cities: I-405 from I-5 to the LA/OC County line; and SR-91 from I-110 to SR-55. What is the anticipated timeframe or years of construction and completion for these projects? Will mixed-flow lanes be added or removed in order to provide the HOT lanes?	Comment noted. The two Express/HOT lane projects mentioned in the comment are assumed to be completed by 2030. For purposes of the RTP, the Express/HOT lanes involve a conversion of the existing HOV lanes and not the removal of any existing mixed-flow lanes. Implementation issues for the Regional Express/HOT lane network will be addressed in the Express Travel Choices Phase II study.
076-06	Raymond Dunton	Gateway Cities Council of Governments	Exhibit 2.8 displays "rising truck volumes in the SCAG region." However, the assumptions underlying the data in this exhibit are not clear, and should be explained in the text. For example, how do these figures relate to the cargo forecast being projected by the San Pedro Bay Ports or the figures assumed in the I-710 Corridor and 91/605/405 Corridor processes? Are the figures in the exhibit based on SCAG's revised truck model? Also, would different truck volumes be found under different RTP alternatives? To avoid local impacts to member cities, the Gateway Cities respectfully request that the potential routes for the East-West Freight Corridor be limited to freeways only, and that non-freeway routes not be further considered. The tables relating to the proposed East-West Freight Corridor present a	Comment noted. The “rising truck volume” exhibit depicts the baseline forecast scenario for the year 2035. This exhibit is based on SCAG’s updated Heavy Duty Truck model, including recent data collected. Further clarification regarding analyses and assumptions has been provided in the text of the final RTP/SCS as appropriate.

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			confusing picture of the plan for implementing reduced-emission vehicles on the corridor. Table 2.8, Benefits of an East-West Corridor Strategy, mentions "50% clean truck utilization" under Environment, but also lists "Zero-emissions technology" under Community. Table 2.11, Environmental Benefits, shows an "East-West Freight Corridor with 100% Zero-Emission Vehicles." It would be helpful to clarify the timeline on which SCAG anticipates low- or zero-emission trucks would be phased in specifically on the East-West Freight Corridor. This implementation timeline should be the same on the East-West Corridor as on the I-710 Corridor through the Gateway Cities, and both should employ 100% zero-emission vehicles.	
076-07	Raymond Dunton	Gateway Cities Council of Governments	Page 79 of the SCS Background Documentation report states that "Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be respected and integrated into the alternatives (with possible revisions for Alternative C only)." Since the PEIR alternatives are designated by number (1, 2, 3) rather than by letter (A, B, C), please clarify whether this statement refers to Alternative 3, called the "Envision 2 Alternative" in the PEIR. Also, we would appreciate having specific information on where, if anywhere, revisions may have been made to the Gateway Cities' jurisdictional input as reflected in our subregional SCS.	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. Land use inputs from GCCOG and OCCOG were not changed by SCAG per the MOUs between SCAG and the delegated subregions. Alternative C examined potential growth redistribution focused on maximizing the region's transit system. Alternative C in the 2012-2035 RTP/SCS is similar but not the same as the Envision 2 Alternative in the PEIR.
077-01	Recyl Chapman	Global Land Use and Economic Council	As a body representative of Southern California's broader business community, the GLUE Council recognizes the crucial roles that transportation and infrastructure play in maintaining the region's economy and quality of life. That is why throughout the RTP/SCS process the GLUE Council has focused on the plan's ability to deliver economic recovery, job recover, and CEQA streamlining to the region. The following key policies and principals are recommended by the GLUE Council for evaluating the plan as they represent the qualities of a good and sound RTP/SCS: 1. Provide Positive Economic Impacts - A plan that is pro economic growth and pro job creation - The RTP/SCS must undergo a true economic cost/benefit analysis so that economic impacts are understood and known by SCAG Regional Council members (and stakeholders) before making a final decision on the RTP/SCS.	Comment noted. The Economic and Job Creation Analysis Appendix has been updated to provide a more comprehensive assessment of the benefits and impacts of the 2012-2035 RTP/SCS.
077-02	Recyl	Global Land	2. Provides Local Control: Any new transportation revenues on	Comment noted. We agree that accountability is a critical

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	Chapman	Use and Economic Council	fees collected must be under the control of the local transportation agency/authority in order to assure local accountability. Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use and transportation.	consideration for any new revenue source. The RTP does not assume nor would it result any changes in control of transportation revenues that would diminish local transportation agency/authority powers nor provide any new powers to SCAG.
077-03	Recyl Chapman	Global Land Use and Economic Council	Assures Revenue Sources are Fair, Understandable and Good for the Economy - Transportation revenue concepts within the RTP/SCS must undergo cost/benefit and other appropriate analysis to assure that they are good for a recovering economy and future growth. They must also be fair and understandable, meaning that an appropriate nexus exists between who/what is being taxed and what is being paid for to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
077-04	Recyl Chapman	Global Land Use and Economic Council	Is Balanced and Accountable: Revenues should be balanced with performance measures, reforms and guarantees that assure the RTP is effective, efficient and responsible to the citizens and taxpayers of Southern California.	Comment noted. The 2012 RTP/SCS is a performance based multi-modal plan that incorporates transit, highway, and active transportation strategies to achieve overall improved system performance.
077-05	Recyl Chapman	Global Land Use and Economic Council	Economic Analysis - Throughout the RTP/SCS process, the GLUE Council has asked for and encouraged SCAG to focus on the plan's benefits and impacts on the regional economy and job creation. The GLUE Council has argued that, done right, the RTP/SCS can be a major catalyst for the region's economic and jobs recovery. Likewise, if not done right, the RTP/SCS could delay recovery or possibly even worsen the region's struggling economy. With this in mind, early on the GLUE Council called for a complete economic analysis for the RTP/SCS, inclusive of a true cost benefit analysis.	Comment noted. SCAG engaged a team of highly regarded economic experts and they have concluded that the 2012RTP/SCS provides a significant economic benefit to the region's economy. The Economic and Job Creation Analysis Appendix has been updated to provide a more comprehensive assessment of the benefits and impacts of the 2012 RTP/SCS. Please see the Economic and Job Creation Analysis Appendix to the Final 2012-2035 RTP/SCS for more information.
077-06	Recyl Chapman	Global Land Use and	GLUE Council appreciates SCAG's dedicating resources to fully articulate the net economic benefits of the 2012-2035 RTP/SCS	Comment noted.

ID	Name	Affiliation	Comment	Response
		Economic Council	and supports the findings: - Every $1 spent on infrastructure investments yields a return of $2.90 - The projected cost per day/per capita is less than $2.00 - The projected benefit per day/per capita exceeds $5.00 - The plan generates an average of 166,000 jobs per year from construction and maintenance expenditures - Improved transportation benefits in commuting, accessibility and congestion relief yeilds 354,000 annual jobs GLUE Council has reviewed the work of SCAG's economic team and their analysis of the RTP/SCS and finds that it does show the plan to be one that "provides positive economic impacts", which is one of the GLUE Council's key qualities of a good plan.	
077-07	Recyl Chapman	Global Land Use and Economic Council	Phase II of the Economic Recovery Strategy - As part of the adoption of the RTP/SCS, the GLUE Council recommends that the SCAG also adopt Phase II of the Economic Recovery Strategy. The adoption could happen simultaneously with the adoption of the RTP/SCS or at the adoption of the RTP/SCS, SCAG could commit to a subsequent adoption of the Phase II Strategy (within six months). The Phase II Economic Strategy would be a way for SCAG to take business community concerns with the RTP and turn them into a positive partnership. Working together, SCAG, GLUE and other stakeholders could develop the Phase II Strategy as a way to focus SCAG and local government on critically necessary regulatory reforms and strategies for new out of the box financing, especially in light of the dissolution of redevelopment agencies. The Phase II Strategy would also give SCAG and GLUE a vehicle for establishing a true Regional Economic Plan to go along with SCAG's other regional plans such as the RTP, the SCS and RHNA. Update adoption of the RTP/SCS and the Phase II Economy Recovery Strategy, GLUE Council looks forward to partnering with SCAG on actions to encourage increased business investment in Southern California, in order to retain the current business base, to identify opportunities for expediting project delivery, to reduce costs and to realize accelerate plan benefits.	Comment noted.
077-08	Recyl Chapman	Global Land Use and Economic Council	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 98.
078-01	Chris Ganson	Governor's Office of	Performance based planning. We are encouraged by SCAG’s efforts to develop a plan based on quantitative measures of	Comment noted.

ID	Name	Affiliation	Comment	Response
		Planning and Research	projected outcomes, or "performance metrics". We encourage SCAG to continue to develop its capacity to employ sophisticated scenario modeling, and to use that information to enable even better-informed decision-making. Models used in regional transportation planning are increasingly important in informing transportation and land use decisions. Transparency of models is therefore a prerequisite to transparency in the planning process and decision-making. We encourage MPOs to display as much information as possible, including model inputs, to help members of both lay and technical public understand and compare model assumptions and results. Similarly, the model code itself should also be made available to members of the technical public for analysis. Consistent with the RTP Guidelines, SCAG has appropriately made its modeling work available for public review. We appreciate SCAG's efforts in providing this information.	
078-02	Chris Ganson	Governor's Office of Planning and Research	Applying performance metrics to inform policy. SCAG's RTP also relies on and discusses useful metrics, and provides clear descriptions of their meaning (example, "reliability" and "lost productivity"). We suggest that SCAG provide additional context when using some metrics. For example, death rate listed per VMT (p. 19, fig 1.2) captures factors such as roadway design, but masks the safety benefits of reducing VMT. Similarly, metrics of delay (pp. 164-165) do not distinguish between long and short trips. Such metrics can penalize a short commute in traffic as compared to a long commute on the open highway. Congestion metrics therefore do not capture the benefits to the transportation system of land use planning strategies that shorten trip lengths. While we believe the RTP would benefit from inclusion of trip length in the metrics used to describe the functioning of the transportation network, we note that the RTP captures these by using separate land use metrics. We encourage SCAG to include another key metric, health benefits resulting from active transportation, such as walking and bicycling, in the evaluation.	Comment noted. The performance measures portion of the 2012-2035 RTP/SCS has been developed through extensive participation and input from stakeholders in the region, as well as collaboration with other large MPOs in the state. To facilitate the dialogue and development of performance measures for the 2012-2035 RTP/SCS, a Performance Measures Subcommittee was established in May 2011. The Subcommittee met and gathered extensive input from various stakeholders and provided recommendations to the Plans and Programs Technical Advisory Committee for further discussion prior to forwarding to the Policy Committees. As a result of the input process and deliberations, over 20 new performance measures have been added to the RTP/SCS including new health-related categories. Performance measures are developed in two types based on their intended uses: one for alternatives evaluation and the other for on-going monitoring. Building on the progress, staff will continue investigating additional measures, including those suggested, as well as methods and tools for analysis and monitoring for future plan updates.
078-03	Chris Ganson	Governor's Office of Planning and Research	A VMT fee: a funding source with potential additional benefits. We appreciate SCAG's efforts in modeling and evaluating a VMT Fee as part of the RTP-SCS analysis. SCAG's consideration of effects of a well-administered VMT fee, including reducing congestion, and possible co-benefits to human health and the	Comment noted.

ID	Name	Affiliation	Comment	Response
			environment (e.g. reducing GHG emissions, improving air quality, and reducing collisions), is beneficial for decision-makers and the public. We appreciate SCAG's work in this area.	
078-04	Chris Ganson	Governor's Office of Planning and Research	Quantify the benefits of Active Transportation. We note that the RTP highlights the link between active transportation and human health (p. 30). We recommend that future planning efforts quantify health benefits of active transportation, so those benefits can be more specifically factored into the transportation planning process. We note that the RTP includes discussions delineating active mode share and accident/fatality rate for cyclists and pedestrians, and elsewhere in the document the expenditure share on active transportation. We recommend that these factors be considered together with active mode health benefits for a comprehensive analysis of this component of transportation	Comment noted.
078-05	Chris Ganson	Governor's Office of Planning and Research	System preservation. For long-run fiscal health, it makes sense to fund full upkeep of existing roadway and highway infrastructure before building more capacity. In this light, we appreciate SCAG's commitment of $217 billion (nearly half of total expenditures) to system preservation, maintenance, and operation.	Comment noted.
078-06	Chris Ganson	Governor's Office of Planning and Research	Protecting the natural environment. The RTP discusses the direct impact of roadway construction and operation on sensitive species via road wildlife strikes (p. 78). We note that the development that will be served by these roads could have a much greater geographic footprint than the roads themselves. As a result, the RTP should consider the potential indirect impact roadway construction can have on land development, and in turn the impact of development on habitat. We encourage SCAG's continued engagement and facilitation in implementation of regional conservation plans.	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. Furthermore, the program for Biological Resources and Open Space includes example mitigation measures for improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.
078-07	Chris Ganson	Governor's Office of Planning and Research	On page 174, the RTP presents the following definition of sustainability: "A transportation system is sustainable if it maintains its overall performance over time with the same costs for its users." The RTP should use a broader definition of sustainability that encompasses the environmental, social and economic metrics used elsewhere in the plan.	Comment noted. The 2012 RTP/SCS performance measures were developed with input from local and regional stakeholder agencies. As with previous cycles, SCAG will consider and review the sustainability measure, and all of its RTP/SCS performance measures, with the next RTP/SCS update.
078-08	Chris Ganson	Governor's Office of Planning and	Implementation monitoring tracks results of the planning process. The RTP anticipates substantial achievement that will be measured by a number of metrics. In order to determine	Comment noted. SCAG currently has a number of mechanisms for monitoring implementation of the RTP/SCS. Those include periodic reports on State of the Region, local Profiles,

ID	Name	Affiliation	Comment	Response
		Research	whether these anticipated achievements occur, we suggest SCAG employ an implementation-monitoring program. Such a program would assess the extent to which local jurisdictions within SCAG approve development in accordance with the plan. It would test the assumptions used in the planning process, allowing for corrections to the plan so that it can continue to track a course towards stated targets. Also, it would check the assumptions made in the planning process, allowing calibration with empirical results.	Performance Monitoring and Assessment Program, periodic household travel survey and bi-annual FTIP update. SCAG will consider further strengthening our monitoring program for the RTP/SCS in the next RTP/SCS update.
078-09	Chris Ganson	Governor's Office of Planning and Research	SCAG's RTP appropriately describes several key co-benefits in the RTP (pp. 175-176). Further, the RTP also quantifies and monetizes those benefits so that they can be considered in cost benefit analyses. We encourage SCAG to clarify how those co-benefits are factored into the decision-making process, and also to expand the scope of co-benefit analyses in its future planning processes.	Comment noted. Co-benefits for the various alternatives were presented during all of the 18 public workshops in summer 2011 as a basis to seek public input. In addition, co-benefits were also estimated for each of the alternatives in the PEIR analysis. Given its significance, SCAG will continue improving its estimates and analysis of co-benefits for future RTP updates, including for example, investigating the health co-benefits of active transportation.
079-01	David Alba	GRID/ECSTC Systems	In the span of my experience and research seeking solutions to great challenges involving goods movement, the first and most profound discovery emerging obvious and opportune is that over decades of industrial growth, container logistics is no longer "port centric". Rather today, goods movement has shifted to become "region centric". That is to say logistics activity at consolidated warehousing, use of freeway networks and surface freight rail has exploded to support the volumes (in millions of containers each year) emanating from the Ports of Los Angeles and Long Beach. The region now bears the brunt of goods movement and with this brunt comes negative environmental impacts. This image on the previous page was taken from page 3 (exhibit 1) from the SCAG Goods Movement Supplemental Report illustrating warehousing locations (in blue dots). We have added the 15 mile radius red rings to illustrate where the vast majority of local truck deliveries emanate from the ports. Ideally, if containers could be delivered in a new method of freight transmission to the center of these areas of delivery density, the freeway trucking component could be completely eliminated decongesting freeway traffic measured in the millions of truck trips and in the hundreds of millions in truck vehicle miles travelled (VMT). The idea of a 100% freight dedicated right of way connecting the ports to the Inland	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.

ID	Name	Affiliation	Comment	Response
			regions is the core motivation of the proposed GRID Freight Pipeline system and transportation network. Among the 2012-2035 Regional Transportation Plan's (RTP), by far, the most ambitious proposed projects specific to goods transportation is the proposed elevated or double decked, East West Freight Corridor. This project calls for a freeway network dedicated to truck drayage from the 710fwy connecting to the IH-15 ultimately linking to areas in the Inland Empire where a high density of container deliveries to consolidated freight service (CFS) warehousing and intermodal yards. This image on the previous page justifies the central argument for the critical need for a freight dedicated corridor crossing the region through the areas where the highest frequency of port truck deliveries are occurring by the thousands every day here and now. Therefore, this public comment is to agree and concur with SCAG's determination that an east west freight corridor is critical to reduce traffic congestion on surface freeways where our commuter cars use our freeway network.	
079-02	David Alba	GRID/ECSTC Systems	However, the proposed conventional project solution, connecting forty miles, estimated to cost $15B, is to build an entirely new freeway network for the purpose of decongesting another parallel freeway network. To some elected officials this project proposal leaves causes for concern. In fact, this proposed mega-project has already received pushback from elected officials whose cities run through these proposed new freeway routes. To begin, fifteen billion dollars to fund this single project in an RTP involving literally thousands of projects represents 10% of the $155B dollars SCAG proposes to raise revenues in the form of a future gas tax increases at $0.30 per gallon or impose a vehicle miles travelled (VMT) tax. These gas tax increases will fill the current gap of budgeting within the RTP's total $450B plan. The certainty that passage of a national gas tax or VMT is imminent as a solution is considered by some to be somewhat optimistic. The following link referencing these specific issues is an article from the San Gabriel Valley Tribune. LINK: http://www.sgvtribune.com/news/ci_19327611 Another significant issue that rapidly growing concern and in some cases firm opposition from elected and city staff officials of cities, especially those positioned within or nearing the route to the proposed surface solution that describes the proposed design of	Comment noted.

ID	Name	Affiliation	Comment	Response
			the E/W Freight Corridor. The following link describes the aligning opposition beginning with the cities of Diamond Bar, Walnut, West Covina, Chino Hills, Montebello, South El Monte, and Pico Rivera. Article from the Whittier Daily News. LINK: http://www.whittierdailynews.com/news/ci_19261687 The central motivation of this public comment is to reach out to SCAG strongly urging staff to take bold forward thinking steps, shifting its regional plan with focus to gravitate towards environmentally superior alternatives that actually have superior efficiency and platforms using 21st Century thinking to solutions specific to streamlining, even potentially undergrounding the transmission of millions of containers from the 5th largest container trade gateway on planet earth significantly decongesting freeway networks on our urban surfaces where human multi-modal transportation is given precious space.	
079-03	David Alba	GRID/ECSTC Systems	The GRID Project is now participating in its 3rd public comments on proposed major transportation infrastructure where one project replaces not one, rather multiple projects. Among the most appealing facets of GRID is that the project pays for itself (economically sustainable). The first three projects GRID has addressed in comment are; 1. Public Comment on the Port of Long Beach Pier S DEIR/DEIS where the SuperDock makes this billion dollar project obsolete 2. The BNSF Southern California International Gateway (SCIG) Project DEIR/DEIS making this controversial development having significant community and environmental justice group and NRDC opposition (saving railroad companies $500M) with a superior operating facility called GRID SuperDock). 3. The SCAG 2012-2035 RTP where GRID proposes a “Freight Pipeline” connecting the ports to inland areas where containers would emerge from this network of freight tunnels emerging at the center of where the highest concentration of containers are delivered. Referencing the earlier SCAG image on page 1, the pipeline follows a route were freight warehouse volume density is most concentrated. To date, the GRID Project has been presented to SCAG senior staff. Also GRID proposers were recently invited to present at the Arroyo-Verdugo SCAG Subregion meeting where the central agenda involved issues pertaining to the 2012-2035 RTP. We submit for SCAG and committee members consideration a	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.

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			conclusion from a recent CARB/CEPA sponsored study entitled; "Development of a California Geospatial Intermodal Freight Transport Model with Cargo Flow Analysis" Contract no: 07-314 (PDF available on CARB website). The Conclusion of the report states the following; "The Case Study provides two primary insights. First, the Case Study quantifies port-related intermodal goods movement through the state of California and beyond. Second, the idealized use of least-CO2 routing constraints illustrates how emissions savings can be achieved through modal shifts. In terms of savings in emissions, it is estimated that a total of ~60% reduction in CO2 emissions is achievable by a modal switch from road to rail. Both of these insights have relevance for consideration of system-wide improvements that may achieve energy savings, CO2 reductions, and associated benefits for air quality".	
079-04	David Alba	GRID/ECSTC Systems	We urge committee members to please consider ensuring that SCAG staff will agree to draft language within the E/W Freight Corridor section in the 2012-2035 Regional Transportation Plan clearly communicate that the East/West Freight Corridor description within the RTP; 1) Consist of other design alternatives beyond those of only truck with road and freeway expanding solutions. 2) Include rail guideway systems infrastructure to carry freight from the same point to point destinations that define the East/West Freight Corridor even in the form of superior environmental alternative. 3) Include rail guideway systems having an underground component consisting of tunneling and/or "freight pipeline" networks included in the RTP language. 4) Include design alternatives that appear to have superior environmental alternatives to consider as required by CEQA and NEPA legislation as expressed under section 101 of the National Environmental Policy Act. In this most perfect storm of economic, environmental, and political drive to create new jobs and industries, SCAG can create a Goods Movement RTP squarely focused on sustainable alternatives both green and economic. We hope that leaders in the region will join other leaders in further investigating the GRID project and grow inspired to its purpose in redefining transportation, smart urban use and economic benefits to the region.	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
080-01	Barney	Highgrove	It is unfortunate that the Highgrove location continues to be	Comment noted. Station-stop site selection for local projects is

ID	Name	Affiliation	Comment	Response
	Barnett	Area Redevelopment	downplayed for such a long period of time. For over 10 years, surrounding cities, civic organizations and local residents have requested a Metrolink station at Highgrove. But city resolutions, letters, and the public comments made at the RCTC meetings continue to be ignored. RCTC now owns the property at Highgrove and according to Ann Mayer, Executive Director of the RCTC, they bought the 17.22 acres of vacant land to enable the Perris Valley Line railroad track to connect to the BNSF main line track. The excess land that RCTC does not need would be an ideal location for the SCAG RTP for commuters between Sand Bernardino County and Riverside County. On Jan.18, 2012 I spoke at the SCAG Regional Transportation Plan meeting in San Bernardino under public comments and submitted written documentation that contained 29 items that included a colored map, city resolutions and letters of support from elected officials and local residents. Some of these items date back to 2001. This information was given to Justine Block who is SCAG's Deputy Legal Council in Los Angeles. Copies of the above e-mail have been sent to SCAG, prior to the Feb. 14, 2012 deadline for public input for their Regional Transportation Plan. The above list is also being sent to RCTC and SANBAG representatives. Please look at the new map and the related information on: www.highgrovehappenings.net that shows the Highgrove Metrolink Station north of the proposed curved track. RCTC's property at Highgrove should be use for the SCAG Regional Transportation Plan due to the ideal location, existing commuter trains, and growth potential due to hundreds of acres of nearby lots ready for homes. This location is way too important to continue to be ignored!	a local issue, and is the responsibility of a project's lead agency within each county.
080-02	Barney Barnett	Highgrove Area Redevelopment	Points made at SCAG public hearing in San Bernardino on Jan. 18, 2012 by R. A. "Barney" Barnett: 1. Location efficiency: The Highgrove Metrolink Station will be an ideal and efficient location for SCAG's Regional Transportation Plan for commuters between Riverside and San Bernardino counties and beyond. 2. Land use: The vacant 17.22 acre property at Highgrove is already owned by the Riverside County Transportation Commission. 3. New Station Location: The request for a station platform has been moved north of the proposed curved track that will connect the Perris Valley Line to the BNSF main line.	Comment noted. Station-stop site selection for local projects is a local issue, and is the responsibility of a project's lead agency within each county. All supporting documents submitted by the commenter have been included in the Public Participation & Consultation Appendix to the final RTP/SCS.

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			This location is still on the same property owned by RCTC and will not interfere with their plan to run future trains between Riverside and Perris. 4. Vacant 1,555 acres: Highgrove has 1,555 acres of vacant buildable land for future homes and businesses including the Spring Mountain Ranch project. 5. $250 Million: One mile east of the Highgrove Metrolink station location is the Spring Mountain Ranch housing project where $250 Million dollars have already been spent on infrastructure for 2,500 new homes. 6. Existing residents: Even before any new homes are built in the Spring Mountain Ranch area there are already 30,777 residents within a 2 mile radius of the Highgrove location that could have been using the existing Metrolink trains. (Riverside EDA figures) 7. Existing trains: On July 15, 2006 Metrolink trains through Highgrove went from 5 days a week to 7 days a week. Each year 3,224 commuter trains pass through Highgrove without stopping. All that is needed is to have parking on RCTC's property next to these existing trains and a station platform to buy tickets. The construction of the Colton Flyover will allow even more future commuter trains through Highgrove but RCTC has no plan to stop any of the existing or future trains at Highgrove! 8. Location: The Highgrove location is ½ mile from the Center St. exit of the I-215 freeway and ¼ mile south of the Riverside/San Bernardino county line. 9. Website: Please look at our website: highgrovehappenings.net There is a map and 10 years of written support for a Metrolink Station at Highgrove but this location has been opposed by RCTC for 10 years.	
081-01	R.A. "Barney" Barnett	Highgrove Area Redevelopment	Regarding a commuter rail station in Highgrove: We have an ideal location. We've got the tracks, we've got the property and we've got the support.	Comment noted. Commuter rail station locations for the Perris Valley Metrolink line are determined by the Riverside County Transportation Commission.
082-01	Claire Schlotterbeck	Hills For Everyone	Safety and Security First (pg. 37 of the Draft 2012 RTP/SCS) We applaud your efforts to ensure Southern California's residents are both safe and secure on the region's transportation system. We were also pleased to see one of your two main goals for safety and security is to "prevent, protect, respond to, and recover from major human-caused or natural events in order to minimize the threat and impact to lives, property, the transportation network and the regional economy" (p. 37). HFE has just completed a near 100 year analysis of fires in the four-	Comment noted. Local agencies, including county fire departments, have the technical expertise and jurisdiction to examine causes and appropriate mitigation of wildfires near freeways.

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			county area surrounding Chino Hills State Park. See Attachment 1, which documents the fire frequency of the Chino Hills. What we've found is that proximity of roads to natural lands directly increases the likelihood for fires to ignite and burn both habitat and homes. For example, as it relates to the 91 Freeway at the juncture of Riverside and Orange Counties, we have provided to you an analysis of the fire perimeters and points of origin for fires that burned in and near Chino Hills State Park. Along this freeway alone, there are 48 separate fires that ignited/burned. From 1914 – 1963 (49 years), 1963 being when the freeway opened, we have records of six fires. Since 1963 – 2012 (49 years), after the freeway opened, there were nearly seven times as many fires recorded (41). The average fire size for recorded fires was 6,263 acres. It is clear to us that the safety and security of residents along this one transportation corridor are being significantly impacted because of 91 Freeway, not to mention disruption of mobility due to road closures because of fires and evacuations. Recommendation #2 With additional roadway and other projects planned in and around the Puente-Chino Hills Wildlife Corridor on the 57, 91 and 71 Freeways, we ask that SCAG analyze potential fire prevention measures along freeways that bisect natural lands. For example, one fire prevention measure would be the creation of hardscape along the roadway edges so that dry brush cannot ignite when transportation-related fires begin. Reducing the fire frequency and duration not only protects habitat, but also allows continued and uninterrupted operation of the major transportation corridors and, importantly, protects life and property of local residents.	
082-02	Claire Schlotterbeck	Hills For Everyone	Biological Resources and Open Space (pg. 79 of the Draft 2012 RTP/SCS) We reiterate the importance of acknowledging the impact of wildland fire with a transportation generated point of origin on our natural lands. Though wildlife fatalities, habitat fragmentation, and other habitat impacts are important—if the habitat can no longer regenerate in its natural and native state due to excessive fire frequency the long term preservation of the land has been lost. Recommendation #3 As previously mentioned, we recommend incorporating fire prevention strategies along natural areas bisected by major transportation corridors. For example, the 91, 57, 71 Freeways all bisect	Comment noted. The Program Environmental Impact Report includes mitigation measures that acknowledge the impact of wildland fire. See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 39.

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			natural lands and not only inhibit natural migration and movement of large animal species, they become areas prone to fire ignition and therefore habitat destruction.	
082-03	Claire Schlotterbeck	Hills For Everyone	Growth in the SCAG Region (2035) (Exhibits 4.1, 4.2 and 4.3) We appreciate that SCAG has included a projected population, employment, and housing growth maps as exhibits, but are dismayed that the maps are illegible. In order to appropriately comment on this map it must be readable. From what we can decipher, the area of the Puente-Chino Hills Wildlife Corridor, known as the Missing Middle, is shown as adding 2000 – 3500 people per square mile. This area is designated as a Significant Ecological Area (SEA) in the Los Angeles County General Plan, thereby acknowledging its significant natural resource values. The owner, Aera Energy, has attempted to achieve entitlements on this property twice without success because of the SEA designation. Ironically, this particular development proposal's population, employment, and housing growth areas contradict the goals of SB 375 and its requirement for reduced vehicle miles traveled (VMT) since the location of the development is no where near transit; does not include a major employment center but instead focuses on large single family residential units; encourages dependency on the automobile and will, when combined, increase VMTs, not reduce them. In addition, related to Exhibit 4.2, there are no employment centers approved or proposed on the Aera Energy property in Los Angeles County. As noted in your Integrated Growth Forecast (p. 111) the "RTP/SCS depends heavily on accurate and credible forecast for future growth in population, housing and employment." It is therefore misleading to show growth when residential units are the only documented development feature. And likewise it is inaccurate to show such a large population growth in an area protected under the County's own SEA program.	Comment noted. The Exhibits 4.1, 4.2 and 4.3 were developed to fit the paper size, but the high resolution GIS map in an electronic format is available upon request. The resource maps have been developed for the purpose of illustration only. The growth figures allocated to the area were based on information received from projects submitted to SCAG through Inter-governmental Review (IGR). SCAG will work with local jurisdictions going forward on small area growth distributions to ensure that the identified Aera property is correctly represented.
082-04	Claire Schlotterbeck	Hills For Everyone	Advanced Mitigation Policy While we understand the RTP is directly related to County Transportation Commissions (CTCs) we would respectfully request that conservation organizations, like HFE, and other related agencies, conservancies, and joint power authority's (e.g., the Santa Monica Mountains Conservancy, Mountains Recreation and Conservation Authority, and the Wildlife Corridor Conservation Authority) be	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources among a wide variety of stakeholders. The intent is to include applicable protected areas, not just NCCP/HCP areas, based on input from a wide variety of stakeholders. Language has been be clarified.

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			included in determining priority conservation areas and plan development. CTCs, with all due respect, do not tend to focus on nor do they specialize in conservation of natural lands. As the Orange County Transportation Authority will confirm, it relied upon many sources for establishing its priority conservation areas under the Environmental Mitigation Program of Renewed Measure M. To that end, HFE would like to offer its assistance with potential conservation areas in the four-county region. In addition, we believe there are similar conservation non-profit organizations and entities throughout the SCAG region that could provide useful, beneficial, and relevant information about their on-the-ground priorities. Recommendation #5 We recommend that SCAG incorporate public workshops and outreach to effectively gather information from conservation organizations and other related agencies on conservation priorities. This recommendation also applies to the limited scope of "agencies" in the Resource Areas and Farmlands section (pg. 128 of the Draft 2012 RTP/SCS). Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) areas to acquire, protect, and preserve land in perpetuity. Recommendation #6 We recommend that SCAG expand the possible mitigation sites to include any undeveloped natural lands in its inventory as this would be a more inclusive list than just focusing on NCCP/HCP lands, which by their very nature are limited to particular areas of each county (where established) and related to specific residential developments, not transportation projects (the Orange County Transportation Authority's NCCP/HCP is the exception).	
082-05	Claire Schlotterbeck	Hills For Everyone	Adaptation (pg. 31 of the Draft 2012 RTP/SCS) HFE agrees Southern California will be faced with extremes in precipitation and temperature, increased storm frequency, and intensity and sea-level rise. However, we feel it is critical to include the impact of fire, especially as more people and roads come to the region. Much of California is facing significant and extended fire seasons, which have tremendous impacts on both the natural environment and the developments nearby. In essence, we have planned our entire infrastructure system (e.g., flood plains, water networks, transportation methods) on the climate being a certain way and now that climate baseline is changing. Since 1986 the number of major forest fires in California has	Comment noted. The Program Environmental Impact Report includes mitigation measures that acknowledge the impact of fire and sea-level rise. Chapter 2 of the RTP/SCS, Transportation Investments, discusses SCAG's approach to Safety and Security, including how to prevent, protect, respond to, and recover from major human-caused or natural events in order to minimize the threat and impact to lives, property, the transportation network, and the regional economy.

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			quadrupled due to more days with summer-like and generally hotter temperatures.1 This increase in fires has numerous implications, including but not limited to: increased firefighting costs, increased danger to residents near the wildland urban interface, and a transition of habitat types to more flammable vegetation due to increased fire frequency. We recommend that as a part of the SCS in the Adaptation section of the document, SCAG provide examples of how it and local jurisdictions plan to adapt to these new risks, especially in regard to wildland fires, through better land use choices. For example as it relates to fires, fire officials, planners, developers, transportation agencies, and others must shift the focus from primarily a reactionary fire plan (i.e., fighting fires when they occur) to a preventative fire plan (e.g., creating buffers between communities and natural lands). What other steps will SCAG be taking to adapt to climate change and to ensure public health, economic livelihoods, the financial sector, the insurance industry, individual comfort, natural lands and recreation areas will be protected?	
082-06	Claire Schlotterbeck	Hills For Everyone	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 39.
083-01	Kim Gilhuly	Human Impact Partners	Performance Measure: Asthma incidence and exacerbation: We were glad to see this included but believe the data point could be strengthened by using NOx as an exposure measurement to better tie this outcome to vehicle emissions and monitor over time. SCAG is currently measuring exposure to NOx and has an accepted methodology to enable this analysis and quantification.	Comment noted.
083-02	Kim Gilhuly	Human Impact Partners	Performance Measure - Analysis of percent of environmental justice households living within 500 feet from high-volume roadways: We request analysis of the percent of environmental justice households and potential health outcomes within 1,000 feet to better reflect research demonstrating health impacts within that area, particularly in environmental justice communities. Protocols for addressing impacts are also needed. We also would request a measure of how many households are below market rate (BMR) vs. market rate (MR), as with the analysis in the EJ appendix.	Comment noted. Data and analysis included in the Environmental Justice Appendix does not account for Plan improvements in vehicle technology particularly for truck only corridors. These corridors in the Plan are exclusively for zero and/or near-zero emission vehicles. Furthermore, the Program Environmental Impact Report (PEIR) accompanying the RTP/SCS includes mitigation measures that would reduce impacts associated with health risk within 500 feet of freeways and high-traffic volume roadways to less than significant. Analysis included in the Appendix also does not account for emissions improvements through the implementation of these mitigation measures. As such, emissions and exposure analysis shown in

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				this Appendix is abundantly conservative and demonstrates worst-case scenario outcomes. If these emissions improvements had been accounted for, we believe the analysis would show little or no areas with worsened emissions ("hot spots") associated with the Plan. Moreover, the currently available data on emissions and on the distribution of households and population is imprecise such that the overlay with emissions and EJ populations will tend to overstate any potential impacts. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with the mitigation identified and to be implemented as part of the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level. Information on emissions impacts for areas within 1,000 feet of highways has been included as additional analysis in the Final Environmental Justice (EJ) Appendix. In terms of the market rate of regional households, a related measure is currently available in the EJ Appendix: household distribution by income quintile. Below market households generally fall within the lowest two income quintiles. Market rate households fall in the middle quintile. Above market rate households generally are within the highest two income quintiles.
083-03	Kim Gilhuly	Human Impact Partners	Performance Measure: Premature deaths due to PM 2.5 Thank you for including this performance measure.	Comment noted.
083-04	Kim Gilhuly	Human Impact Partners	EJ Performance Measure: Jobs-housing imbalance SCAG was responsive to stakeholders in measuring a jobs-housing imbalance, but the measurement could be improved by using methodology that UC-Davis and the Sacramento Council of Governments has developed. Theirs is a relatively simple methodology to do a jobs-housing fit by creating a 4-to-5-mile buffer zone around major job centers, and comparing wages provided by those jobs to cost of housing within the buffer zone to see if there is a good fit. UC-Davis is developing this tool to be able to project the jobs-housing fit into the future, which would enable SCAG to show how the Plan will impact this performance measure.	Comment noted. Please see the job/housing fit and balance analysis for the inter-county commuters in the Draft Environmental Justice Appendix (pgs. 59-61). SCAG staff used the same Longitudinal Employer-Household Dynamics (LEHD) data as SACOG/UC Davis to conduct the following analysis: (1) convert LEHD data to SCAG TAZ geographies and conduct a correlation analysis between job/worker ratio and commuting distance/time; (2) define both distance and travel based buffers by modes to investigate relationships between job/worker ratio, job pay/worker earning match and commuting distance, travel time and mode usage; (3) confirm the observation and conclusion for inter-county commuters using the LEHD data. The initial result from the item #1 in the methodology described

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				above showed that there is no correlation between job/worker ratio and commuting distance. SCAG anticipates completion of the entire analysis by summer and will share the results and policy implications with academics, MPOs and all interested parties.
083-05	Kim Gilhuly	Human Impact Partners	EJ Performance Measure: Gentrification & displacement We applaud this measure and request ongoing monitoring and development of mitigation measures. SCAG's analysis indicates that with ongoing concentration of new housing in High Quality Transit Areas (HQTA), gentrification EJ and displacement will happen. While this can be discerned from the analysis of what has happened with the indicators historically, they do not project change with these indicators. It would strengthen this EJ analysis to see how many market-rate vs. below-market rate units are planned for each TAZ, and the EJ Toolbox could be strengthened by suggesting displacement mitigation measures.	Comment noted. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. Trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering. Population and household figures by income group for the RHNA planning period are provided to each local jurisdiction such that the required housing by type, income category, and affordability can be addressed through local housing element updates - which will be due 18 months after the adoption of Final RTP/SCS (around October 2013).
083-06	Kim Gilhuly	Human Impact Partners	EJ Performance Measure: Access to employment and services (45-minute auto access) Kudos for measuring this, but we would like to see measurements for walking and biking access and recommend using a 30-minute walking or biking travel time. An alternative method would be to map ½ mile access to employment and services for walking and cycling. The cut-off choice of 45- minute auto access time does not show, from a health lens, how people could be more likely to use active transport methods to access jobs and services.	Comment noted. The distance based accessibility analysis within a 3-mile and 5-mile radius for each environmental justice population group (see Figures 9 &10, Page 6 in the Draft Environmental Justice Appendix) provides indications about destinations that can be reached by all transportation modes under different travel times. While the analysis does not provide the imputed travel time, it can be assumed that to reach any destination within a 3-mile radius will take 60-80 minutes by walking, 8-12 minutes by bicycle or bus, and just under 5 minutes by auto.
083-07	Kim Gilhuly	Human Impact Partners	EJ Performance Measure: Access to parks - Similar comments to access to employment and services, above [comment 6]. It is not clear for either measure what "average" access is.	Comment noted. Average accessibility to employment, services, and parks represents the percentage of the region's opportunities measured by jobs, services, or open space (parks measured areas) that can be reached by different transportation modes and within a fixed travel time.For example, in Figure 21 on Page 63 (or in Table 24, Page 66 in the Draft Environmental Justice Appendix), the regional average of job accessibility by auto for 45 minutes is about 25% of regional job opportunities, while by bus is only about 4% of regional job opportunities.
083-08	Kim Gilhuly	Human Impact Partners	EJ Performance Measure: RTP project investment share This analysis does not detail what kinds of investments are targeted	Comment noted. Please refer to Figures 11 and 12 on page 49 in the Draft Environmental Justice Appendix, which demonstrate

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			for each quintile, i.e., will there be more rail investment in higher or lower income quintiles, for example. This analysis was a step in the right direction but more detail would help determine if the type of investment is targeted for the mode usage of each income level and/or ability/disability.	transportation investments by income quintile and transportation investments by ethnicity. Although this data was not broken down further by income and ethnicity, Figure 9 on page 48 in the Draft Environmental Justice Appendix provides information on overall transportation system usage by mode and by income and Figure 10 displays total system usage by mode and by ethnicity.
083-09	Kim Gilhuly	Human Impact Partners	EJ Performance Measure: Air pollution and noise exposure The analysis showed clearly that risks are higher for EJ populations, and that more current and future housing near freeways and busy roadways is targeted for lower-income residents and minorities. We were pleased to see that a mitigation measure in SCAG's toolbox is to do a corridor-level analysis for proposed projects in areas where roadway air quality impacts are concentrated among EJ communities. We request more indicators that measure actual health outcomes. Respiratory risk was not well-defined. Also, mapping in smaller geographies would be useful as the maps were unable to show much at the regional level. With regard to noise, we see that highway noise reductions will not benefit EJ communities as much as non-EJ communities. We appreciate the noise mitigations suggested in the Toolbox.	Comment noted. The RTP/SCS evaluates region-wide impacts on various demographic groups. The Title VI and Environmental Justice analysis for the 2012 RTP/SCS includes an assessment of exposure to ozone, concentration of particulate matter emissions, cancer risks, respiratory hazard risks, and noise. In addition, the Program Environmental Impact Report for the RTP/SCS included a Health Risk Assessment in Appendix F. Please note that the Environmental Justice Appendix has been revised to include health impacts on children 5 years old and below, as further recognition of this important public health issue. Further, staff will clarify the respiratory risk information contained within the Environmental Justice Appendix. In terms of our future efforts to address health impacts in regional planning, SCAG is currently working to enhance our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. By integrating health impacts data into this land use and transportation simulation tool, users can assess the health related outcomes associated with changes in the built environment. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016.
083-10	Kim Gilhuly	Human Impact Partners	EJ Performance Measure: Share of household and employment growth in High Quality Transit Areas (HQTA) Would like to see household growth, job growth, and population growth. Would also like to see how many large (3-4 bdr) units, how much senior housing, and below market rate (BMR) units projected for HQTA.	Comment noted. For household and job growth in the High Quality Transit Areas (HQTA), please see Table 43 on Page 121 in the Draft Environmental Justice Appendix. The population and households by income group for the RHNA planning period are provided to each local jurisdiction, such that the required housing by type, income categories, and affordability can be addressed through housing element updates by local jurisdictions. This piece of the planning process will be due 18 months after the adoption of Final RTP/SCS (around October

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				2013).
083-11	Kim Gilhuly	Human Impact Partners	SCAG stated that the following recommended metrics would be targeted for a future RTP/SCS if data became available. We would encourage SCAG to continue researching ways to measure and report out these indicators earlier than in the next RTP/SCS.	Comment noted. We look forward to working with Human Impact Partners on future efforts to obtain data to monitor performance.
083-12	Kim Gilhuly	Human Impact Partners	RTP/SCS Performance Measure: Percent of households with walk access to neighborhood services SCAG states further research is needed. SANDAG has pioneered mapping strategies for this, and SCAG has laid the groundwork for this analysis in the Environmental Justice appendix.	Comment noted. SCAG is continuously working to improve its data and technical approaches to analyzing the behavior patterns of the region's 18 million residents. For this particular measure, further research is needed to understand the residential location and nearby built environment for certain population groups, in particular Native Americans and those who identify as some other race (non-Hispanic).
083-13	Kim Gilhuly	Human Impact Partners	RTP/SCS Performance Measure: Percent of existing and new BMR rental housing units in TOD areas. SCAG states further research needed, yet has measured a similar indicator above as "Share of growth in High Quality Transit Areas".	Comment noted. After Plan adoption, we will continue to work to identify appropriate metrics for analyzing and monitoring key assumptions and outcomes.
083-14	Kim Gilhuly	Human Impact Partners	RTP/SCS Performance Measure: Percent of Jobs within 15 minutes walk of transit - SCAG states that this is pending available data, but it is unclear why this is not included since they are measuring growth of jobs and households in high quality transit areas. Also we are interested in proportion of jobs and households within ¼ mile of local public transit (bus and rail) and within ½ mile of regional public transit.	Comment noted. The Final RTP/SCS document (and/or the appendices) will include this measurement, or a reasonable proxy.
083-15	Kim Gilhuly	Human Impact Partners	RTP/SCS Performance Measure: Percent of population within ½ mile of high frequency transit stop - SCAG states that this is pending available data, but we note that SCAG has assigned this task to their GIS team, which is a great sign. It is unclear what data is needed beyond what SCAG has access to since they have measured the share of household and employment growth in high quality transit areas.	Comment noted. The Final RTP/SCS document (and/or the appendices) will include this measurement, or a reasonable proxy.
083-16	Kim Gilhuly	Human Impact Partners	RTP/SCS Performance Measure: Percent of residents within ½ mile walk to parks and open space (pending available data) (new research measure) - SCAG states this is pending available data but did perform a distance to parks analysis in the EJ appendix, so it appears this data is available.	Comment noted. The results for park/open space accessibility indicate very limited accessibility within 45 minutes of travel time. Within a 1/2 mile radius, the availability of park or open space is likely expected to be very low, almost near zero. However, in the future SCAG can estimate and provide information on the percent of region's population within a 1/2 mile of parks or open space.
083-17	Kim Gilhuly	Human Impact	RTP/SCS Performance Measure: Percent of households living	Comment noted. The roadway noise analysis in SCAG's

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		Partners	with >65 decibels of noise - SCAG states that further research is needed, but this data is collected for the EJ appendix and appears to be available.	Environmental Justice Appendix was generated using guidance from the Federal Highway Administration (FHWA), which advises that noise impacts occur when noise levels increase 3 dB along roadways where noise levels are currently, or would be in the future, above 66 dB. Once roadways were identified using this definition, staff measured the environmental justice impacts of noise in surrounding areas within 150 feet of selected roadways. In order to identify all areas that contain noise levels in excess of 65 decibels on a comprehensive level, however, detailed noise contours are needed to identify the geographic extent of noise impacts throughout the region. Such information was not available for the preparation of the Plan.
083-18	Kim Gilhuly	Human Impact Partners	We encourage SCAG to incorporate these additional performance measures, which were not included.	Comment noted. See responses below.
083-19	Kim Gilhuly	Human Impact Partners	RTP/SCS Performance Measure: Daily amount (in minutes) of work and non-work trip related physical activity - Methodology exists to predict this as the MTC has done.	Comment noted.
083-20	Kim Gilhuly	Human Impact Partners	RTP/SCS Performance Measure: Chronic disease resulting from changes in physical activity due to transportation project expenditures - Methodology exists to predict this via the California Department of Public Health.	Comment noted. To address SB 375, updated CTC Guidelines, and stakeholder requests, SCAG has included numerous health based metrics not previously included in the RTP. SCAG will explore further improving the assessment of health benefits of active transportation and other RTP/SCS policies in the future RTP/SCS updates.
083-21	Kim Gilhuly	Human Impact Partners	RTP/SCS Environmental Justice Performance Measure: Injuries and fatalities from motor vehicle collisions, including from trucks, for pedestrians, bicyclists, as well as motor vehicle operators - While this is measured for performance measures, there is no EJ analysis.	Comment noted. The key to conducting an environmental justice (EJ) analysis for regional planning and transportation investments is the availability of data. To provide an effective EJ analysis for accidents and injuries for both vehicles and active transportation modes, SCAG must collect the following data items from the California Highway Patrol (CHP): (1) vehicle accident data by location, (2) injuries for active transportation modes by location and their association with ethnicity and income, and (3) correlations of accidents, injuries, and deaths with built environment and transportation modes, and investment by location. SCAG is committed with available funding and resources to this end and is in the process of building the staff, data/tools, and the technical capacity needed to conduct this analysis in preparation for the 2016 Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS).
083-22	Kim Gilhuly	Human Impact	RTP/SCS Environmental Justice Performance Measure: SCAG	Comment noted. Quantification of health impacts (e.g.,

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		Partners	looks at air quality and some EJ respiratory health issues, but the health effects of changes in air quality due to transportation expenditures would be clearer if premature mortality were measured and reported specifically in environmental justice communities. SCAG measures particulate matter, and so could do the calculation to attribute premature mortality to mobile sources of PM2.5.	premature mortality) that result from mobile emissions sources requires the establishment of concentration-response functions. PM emissions would need to be converted to air quality concentrations in terms of parts per million (ppm) so that the associated health effects can be assessed. After consultation with the South Coast Air Quality Management District (SCAQMD), SCAG cannot obtain PM concentrations at this time that are solely attributable to mobile sources. SCAG will continue to collaborate with the SCAQMD, California Air Resources Board (ARB), and the US Environmental Protection Agency (EPA) to develop tools that can provide quick assessments of PM concentrations from mobile sources for the next round of the RTP, due in 2016.
083-23	Kim Gilhuly	Human Impact Partners	RTP/SCS Environmental Justice Performance Measure: Physical activity gained from active transport for EJ communities. SCAG considers accessibility to parks, employment and services, which all tie into why someone would walk/bike/take public transit to get to these services. We request that the health benefits from transportation decisions be made explicit by measuring them.	Comment noted. SCAG is currently in the process of enhancing our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. By integrating health impacts data into this land use and transportation simulation tool, users can assess the health related outcomes associated with changes in the built environment. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016.
084-01	Emmanuel Sanchez	Imperial County Air Pollution Control District	The list of transportation investment projects found in page 5 and 6, calls for many beneficial projects within the SCAG region which would ultimately reduce VMT, traffic congestion and vehicle emissions. On top of the priority list and one of the most expensive projects is the passenger high speed rail system which is schedule to provide services to most of the SCAG region with the exception of Imperial County. As indicated in Table 1.7 found on page 28 of the RTP, the Imperial County is currently classified as non-attainment for 2008 8-hour Ozone standard, as well as non-attainment for the PM10 and PM2.5 standards which is why it is very important and crucial that projects such as the high speed rail system are built and tied into the Imperial County to alleviate the same issues other SCAG regions are having and expected to have in future years. As it stands, the Air District will not benefit from the emission reductions a high speed rail system can provide. For this reason,	Comment noted. The commuter rail projects and high speed and intercity passenger rail projects selected for inclusion in the 2012 RTP/SCS were selected by the High Speed Rail Subcommittee of the Transportation Committee, to be forwarded to the Transportation Committee and the Regional Council for inclusion as fiscally constrained plan projects in the 2012 RTP/SCS. The selected projects were approved by SCAG's Policy Committees and Regional Council. The financial and productivity assumptions estimates of the California High Speed Rail Authority's Draft 2012 Business Plan are not considered in the 2012 RTP/SCS. To the extent that the business plan is a resource for the 2012 RTP /SCS, it is due to the presence of new project delivery strategies in the business plan, such as the "blended approach." Staff will continue to work with the District to find solutions for meeting EPA Standards.

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			the Air District would like to request a cost-feasibility analysis and/or a detailed explanation which demonstrates why tying a high speed rail system to the Imperial County is not beneficial.	
084-02	Emmanuel Sanchez	Imperial County Air Pollution Control District	The current financial plan found on page 7 calls for an estimated $110.3 billion revenue source from a proposed mileage-based user fee beginning in 2025. If this revenue source is ultimately approved and implemented, Imperial County residents will be at an enormous disadvantage and end up paying more into this funding source due to the county's geographical location and lack of transportation resources available in the area (currently high-speed rail not proposed). Even though the Imperial County's population has continued to grow at a fast rate during the last couple of years (page 17), it still continues to heavily rely on goods and services that are mainly provided in metropolitan areas such as San Diego, Riverside and L.A. Counties. As mentioned in the first comment, the Air District is in desperate need of transportation improvements that will not only allow easier, faster and safer services to other SCAG regions but that it will also reduce air emissions in the Imperial County region.	Comment noted. The proposed mileage-based user fee, like the existing state and federal gas excise taxes, is directly linked to the amount of transportation resource used. While the mileage-based user fee would charge drivers for each mile traveled, the existing gas excise taxes charge drivers for each gallon consumed. The amount of gallons of gas consumed is a direct product of the total number of miles traveled. While the implementation of the mileage-based user fee would not cause any drivers to increase the number of miles traveled, it would provide additional revenue to fund transportation improvements that would allow for easier, faster, and safer travel options in Imperial County and throughout the SCAG region. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users.
084-03	Emmanuel Sanchez	Imperial County Air Pollution Control District	The Air Quality section on page 79 provides several measures that are necessary to address air emission necessary to achieve RTP goals. One of the measures is to have "ARB measures set new on-road and off-road engine standards and accelerate turnover of higher emitting engines from the in-use fleet" among others. It is important for SCAG to continue working with the California Air Resource Board and to discuss these types of measures in a consistent basis to ensure new engine standards and the turnover of higher emitting engines will be feasible for both the private and public sector in upcomming years. In 2008, CARB adopted the Truck and Bus regulation which requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Heavier trucks must be retrofitted with PM filters beginning January 1, 2012, and older trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. Ultimately, the Air District would like to know if the emission reductions found on Table 3.2: Criteria Pollutant Emission by County -- Existing Conditions (2012) vs Plan (2035) have been approved by CARB and will be	Comment noted. The criteria pollutant emissions by county in Table 3.2 are based on the RTP travel activity data (including 2012 and 2035 Plan) that are provided to CARB for updating the emission inventory. See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 40.

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			included in their emissions inventory.	
084-04	Emmanuel Sanchez	Imperial County Air Pollution Control District	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 40.
085-01	Stephanie Cohen	Kohl Ranch Company LLC	As explained below, we are concerned that the draft RTP/SCS as proposed would result in an an inappropriate use of the regional growth forecast planning effort to encroach on local land use authority and jurisdiction.	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region , local jurisdictions maintain local land use authority.
085-02	Stephanie Cohen	Kohl Ranch Company LLC	We therefore request that SCAG (1) extend the comment period and make TAZ data available for public review and comment;	Comment noted. The TAZ-level dataset was provided upon request during the comment period.
085-03	Stephanie Cohen	Kohl Ranch Company LLC	(2) correct the TAZ data and maps to accurately reflect current local planing decisions including entitled projects; and	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. The TAZ level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.
085-04	Stephanie Cohen	Kohl Ranch Company LLC	(3) revise the SCS so that consistency determinations are not made at the small-scale level of a TAZ but at the jurisdictional level to allow reasonable flexibility and appropriate land use decision making authority at the local level.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
085-05	Stephanie Cohen	Kohl Ranch Company LLC	1. The SCS does not appear to account for projects already in process. Kohl Ranch owns over 2200 acres of land in Southern California. However, we are concerned that the SCS process has not full accounted for projects are are already in process.Regent	Comment noted. SCAG's growth forecasting process and results are primarily based on the bottom-up local input process. However, SCAG also reviews regionally significant projects through the Intergovernmental Review (IGR). Based on the

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			has severl projects i nthe area that are fully entitled and approved for build-out, as well as proposed projects with pending applications that represent a substantial investment of resources to design, plan and communicate with the community and responsible agencies.	information received from the IGR projects, SCAG evaluates and incorporates the growth from those IGR project areas to assess their impacts on the regional transportation system. SCAG will add to the 2012 RTP/SCS Growth Forecast Appendix the description of how to evaluate and incorporate the significant IGR projects into small area socioeconomic database from the 2008 RTP growth forecast report.
085-06	Stephanie Cohen	Kohl Ranch Company LLC	While the SCS itslef states that it was created with input from local jurisdictions (see 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.	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region.
085-07	Stephanie Cohen	Kohl Ranch Company LLC	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 already approve or that are reasonably foreseeable projects which local jurisdictions have already spent considerable resources processing.	Comment noted. SCAG identifies regionally-significant local plans, projects, and programs through the Intergovernmental Review (IGR). SCAG typically assigns the growth into those IGR project areas to assess their impact on the regional transportation system. In cases where local input differs from the IGR data, the local jurisdiction is consulted.
085-08	Stephanie Cohen	Kohl Ranch Company LLC	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.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The TAZ-level dataset was provided upon request during the comment period.
085-09	Stephanie Cohen	Kohl Ranch Company LLC	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.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The TAZ-level dataset was provided upon request during the comment period.
085-10	Stephanie Cohen	Kohl Ranch Company LLC	The SCS states that the land use projections contained in the SCS are based on the distribution of growth forecast data to TAZs (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	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. The

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			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.	TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS.
085-11	Stephanie Cohen	Kohl Ranch Company LLC	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.	Comment noted. The TAZ level dataset was provided upon request during the comment period.
085-12	Stephanie Cohen	Kohl Ranch Company LLC	We were able to obtain partial [TAZ] 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.	Comment noted. The TAZ-level dataset was provided upon request during the comment period.
085-13	Stephanie Cohen	Kohl Ranch Company LLC	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.	Comment noted. The TAZ-level dataset was provided upon request during the comment period.
085-14	Stephanie Cohen	Kohl Ranch Company LLC	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.	Comment noted. Modeling and other technical data is available upon request.
085-15	Stephanie Cohen	Kohl Ranch Company LLC	In particular, we cannot assess whether the underlying data adequately reflects all developments as approved. Under the federal (5 U.S.C. S500 et. seq) and California Administrative procedures Acts (Gov. Code SS11340 et. seq., including S 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).	Comment noted. The TAZ-level dataset was provided upon request during the comment period.
085-16	Stephanie Cohen	Kohl Ranch Company LLC	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.	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region.

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085-17	Stephanie Cohen	Kohl Ranch Company LLC	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 utlizing 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 recei CEQA streamlining benefits (Draft RTP/SCS P. 122.) "One way of determining consistency [with the SCS] is if a proposed residential/mixed use of TPP [transit priority project] conforms with the development type designated for a TAZ." (Draft RTP/SCS, p. 148.)	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
085-18	Stephanie Cohen	Kohl Ranch Company LLC	Despite these explicit statements that the existing TAZ data will be critically improtant to future dcisions affecting projects, SCAG has not provided the public the opportunity to review and comment on the TAZ data in any meaningful way.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level. The TAZ-level dataset was provided upon request during the comment period.
085-19	Stephanie Cohen	Kohl Ranch Company LLC	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 SB375 that includes consistency with the Sustainable Communities Strategy portion of the RTP as well (40CFR93.102; 42USC7506). 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.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level. Transit projects with obligated funding from state or federal sources will not have those funds de-obligated as a result of any adopted SCS.
085-20	Stephanie Cohen	Kohl Ranch Company LLC	We are concerned that a project's inconsistency wit hthe growth projections contained in the SCS may have broader implications as well. Local jurisdictions will be under	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its

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			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.	general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.
085-21	Stephanie Cohen	Kohl Ranch Company LLC	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 SB375's mandate that the SCS must not supersede the land use authority of cities and counties. (Gov Code 65080(b)(2)(J).	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The growth and land use assumptions for the RTP/SCS are proposed to be adopted at the jurisdictional scale.
085-22	Stephanie Cohen	Kohl Ranch Company LLC	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 not been approved by these elected officials.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
085-23	Stephanie Cohen	Kohl Ranch Company LLC	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.	Comment noted.
085-24	Stephanie Cohen	Kohl Ranch Company LLC	Accordingly, requiring consistency determinations concerning use designations, density and building intensity at the small scale of each TAZ would be inappropriate and overly-prescriptive.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
085-25	Stephanie Cohen	Kohl Ranch Company LLC	Again, SB375 specifically precludes SCAG from interfering with local land use decisions. SB375 requires that an SCS "identify	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and

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			the general location of uses, residential densities within the region..." California Gov Code S65080(b)(2)(B)(i). 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.	land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
085-26	Stephanie Cohen	Kohl Ranch Company LLC	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).	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.
085-27	Stephanie Cohen	Kohl Ranch Company LLC	Despite SB375'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.	Comment noted. SB375 does not require that a jurisdiction's land use policies and regulations be consistent with the Regional Transportation Plan or Sustainable Communities Strategy. In some cases, SCAG altered small area land use assumptions to better relfect recent trends occurring in many transit-rich areas of the region. In 2011, SCAG conducted a series of planning sessions with local governments to gather all relevant land use and transportation policies, plans and data required to formulate the SCS. Using survey instruments, one-on-one discussions and Geographical Information System (GIS) software, the local governments provided up-to-date information including growth opportunities, local land use plans and measures, transportation demand management (TDM) measures, transportation systems management (TSM) measures and other local transportation strategies.
085-28	Stephanie Cohen	Kohl Ranch Company LLC	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, area 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.	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region, local jurisdictions maintain local land use authority.
085-29	Stephanie	Kohl Ranch	4. Conclusion The draft RTP/SCS represents a substantial and	Comment noted. SCAG based the growth and land use

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	Cohen	Company LLC	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.	assumptions in the RTP/SCS on input received from each of our 197 local jurisdictions. In some cases, SCAG altered small area land use assumptions (within jurisdictional boundaries) to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region, local jurisdictions maintain local land use authority.
086-01	Tom Williams	LA 32 Neighborhood Council	High Desert Corridor – If you look at the population, employment, and land use plans there are no plans for the High Desert Corridor. Will the High Desert Corridor influence the population and especially the employment along a 56 mile area because it is not reflected in the population growth, nor in the employment, which is 2035. You have the Corridor going through a lot of agricultural land however. it does not indicate that the Corridor is going to do anything to that farmland. One of the reasons I am interested in that is, freight. You sometimes call it goods, cargo, or freight but most common is freight containers. Those come from the ports including Hueneme however, let's look at Port of LA and Long Beach. They project 44 million TEU's. A lot of people do not know what a TEU is because things have changed but your projects do not reflect that sort of change that is already going on in the maritime industry. That is, there are container ships, right now, that can take a 53' container and they are increasing. This is important because right now the predominant trade in trucks is to take a 40' container and break it into one 53' container by rearranging it. Then you have to stack to empty 40's someplace. Because of this there is a complex maritime freight going on. The Draft RTP does not reflect this because in the South Bay area, Gateway Cities, there may be fewer trucks based on the fact that they can load a 53' container on to either rail or onto trucks. If you look at the Port of LA and Long Beach combined they will produce about 45-50 thousand trucks a day but SCAG has trucking on the east west Corridors of 210, 10, 60 and others, of over a 100 thousand trucks. Where do they all come from? Based upon the available information in both the primary and the appendices of the RTP, we do not know. This is a major flaw, it is an incomplete and inadequate description of the freight	Comment noted. The High Desert Corridor is depicted in Table 2.2 and Exhibit 2.1 of the RTP/SCS.

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			movements from the urban areas into the High Desert Corridor. The Corridor is a basic Measure R, fully funded, probably the most profitable of any of the Measure R public/private partnerships. It is all toll system but it is not depicted in your RTP.	
086-02	Tom Williams	LA 32 Neighborhood Council	One of the reasons I am interested in that is, freight. You sometimes call it goods, cargo, or freight but most common is freight containers. Those come from the ports including Hueneme however, let's look at Port of LA and Long Beach. They project 44 million TEU's. A lot of people do not know what a TEU is because things have changed but your projects do not reflect that sort of change that is already going on in the maritime industry. That is, there are container ships, right now, that can take a 53' container and they are increasing. This is important because right now the predominant trade in trucks is to take a 40' container and break it into one 53' container by rearranging it. Then you have to stack to empty 40's someplace. Because of this there is a complex maritime freight going on. The Draft RTP does not reflect this because in the South Bay area, Gateway Cities, there may be fewer trucks based on the fact that they can load a 53' container on to either rail or onto trucks. If you look at the Port of LA and Long Beach combined they will produce about 45-50 thousand trucks a day but SCAG has trucking on the east west Corridors of 210, 10, 60 and others, of over a 100 thousand trucks. Where do they all come from? Based upon the available information in both the primary and the appendices of the RTP, we do not know. This is a major flaw, it is an incomplete and inadequate description of the freight movements from the urban areas into the High Desert Corridor. The Corridor is a basic Measure R, fully funded, probably the most profitable of any of the Measure R public/private partnerships. It is all toll system but it is not depicted in your RTP.	Comment noted. Some ocean carriers have used 53-foot containers for moving cargo using container ships. However, the 53-foot container does not currently conform to existing international standards. New Panamax ships, the newest type of container ship designed to carry an increased number of containers, are measured by the number of twenty-foot equivalent units (TEUs) they will hold. At this time, it would be premature to assume a significant shift from ocean carriers utilizing twenty- and forty-foot equivalent units (FEUs) shipping containers to the use of 53-foot containers. Moreover, even assuming a shift by ocean carriers to the use of 53-foot containers, the impacts on the number trucks moving through the region would remain unknown. Reasons include, but are not limited to: 1) Considerable volumes of goods moving through the region are domestic freight and do not move through the San Pedro Bay Ports 2) Transloading services, which often deconsolidate cargo from TEUs and FEUs to 53-foot domestic containers, often provide additional value-added services besides repackaging 3) Not every container would be filled with goods all destined for the same location Truck moving through the SCAG region have varied origins and destinations. The RTP discusses the numerous potential origins and destinations including international imports and exports through the San Pedro Bay Ports, imports and exports through international border crossings, air cargo, local and regional manufacturing, and goods movement dependent industries. SCAG includes the High Desert Corridor in the 2012 RTP and continues to work with stakeholders as appropriate to support the project.
086-03	Tom Williams	LA 32 Neighborhood Council	710, Extension – There is in fact a federal injunction right now that says you cannot do any design, but if you take all of the little pieces you have within your RTP, specifically the cost, how do you get five significant digits of cost from one. There is no reference as to what the source was and right now the most current source was maybe going up to 2, 3, or 4 billion, nobody knows. You have an unreferenced significant cost in the project	Comment noted. The project cost for the SR-710 project is based upon the cost for this project that is identified in Metro's Long Range Transportation Plan, escalated to year-of-expenditure dollars as required by the Federal Highway Administration for all project cost figures.

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			list. Where did you get the numbers? You must have had a design, concept, or otherwise.	
087-01	Tom Williams	LA 32 Neighborhood Council and NELA Coalition	Where are the appendices referenced in the RTP Table of Contents and throughout the Report??? The Supplemental Reports are not technical supports for the RTP. See attached for RTP references and table of contents copies. Please withdraw the Draft RTP, revise, upgrade with technical appendices, and recirculate.	Comment noted. The appendices listed in the Table of Contents serve to support the 2012-2035 RTP/SCS main document and can be downloaded in their entirety online at http://scag.ca.gov.
088-01	Dolores Gonzalez-Hayes	Latino Health Access	We thank the Southern California Association of Governments (SCAG) and its staff for the hard work on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Latino Health Access is particularly pleased to see that important health and equity indicators were included in the strategy positively impacting the health of our community. The high levels of air pollution and health problems experienced in the Southern California region require strong action to transform transportation and land use planning. The Los Angeles region continues to be rated as the most polluted area for ozone in the country by the American Lung Association and the public health toll remains high.	Comment noted.
088-02	Dolores Gonzalez-Hayes	Latino Health Access	We trust and rely on the research by the American Lung Association in California. The agency quantified the respiratory health benefits of smart growth strategies in the Southern California region. Their analysis showed that the six-county Southern California region could avoid over $16 billion in cumulative health and societal costs through smart growth strategies that reduce the growth in the region's vehicle trips by 20 percent by 2035. While large, these benefits may represent a small fraction of the greater benefits that accrue with more physically active transportation options, as envisioned and quantified by the California Department of Public Health's I-THIM modeling project. Understanding the potential benefits of given planning scenarios will help to identify plans that provide the greatest reductions in harmful emissions and chronic illnesses.	Comment noted.
088-03	Dolores Gonzalez-Hayes	Latino Health Access	As an agency we see firsthand the effects that obesity and diabetes has on the lives on our clients and recognized the need for greater focus on a shift to active transportation modes like walking, cycling and transit that reduce pollution emissions and gets people out of their cars and into a more physically active	Comment noted.

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			lifestyle. We join the American Lung Association in offering the following comments and recommendations to ensure that the Sustainable Communities Strategy and future transportation investments place sufficient emphasis on promoting active transportation modes and transit oriented development, measuring and improving health progress, and ensuring that health and equity are imbedded in the decision making process for this plan and future planning efforts.	
088-04	Dolores Gonzalez-Hayes	Latino Health Access	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.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
088-05	Dolores Gonzalez-Hayes	Latino Health Access	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.	Comment noted. The performance measures portion of the 2012-2035 RTP/SCS has been developed through extensive participation and input from stakeholders in the region, as well as collaboration with other large MPOs in the state. To facilitate the dialogue and development of performance measures for the 2012-2035 RTP/SCS, a Performance Measures Subcommittee was established in May 2011. The Subcommittee met and gathered extensive input from various stakeholders and provided recommendations to the Plans and Programs Technical Advisory Committee for further discussions prior to forwarding to the Policy Committees. As a result of the input process and deliberations, over 20 new performance measures have been added to the RTP/SCS including new health-related categories. Performance measures are developed in two types based on their intended uses: one for alternatives evaluation and the other for on-going monitoring. Building on the progress, staff will continue investigating additional measures as well as methods and tools for analysis and monitoring for future plan

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				updates.
088-06	Dolores Gonzalez-Hayes	Latino Health Access	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.	Comment noted. To address SB 375, updated CTC Guidelines, and stakeholder requests, SCAG has included numerous health based metrics not previously included in the RTP. SCAG will explore further improving the assessment of health benefits of active transportation and other RTP/SCS policies in the future RTP/SCS updates.
088-07	Dolores Gonzalez-Hayes	Latino Health Access	•Focus investments on completing transit systems and building out transit infrastructure, rather than highway expansion, including the following: o Doubling Metrolink ridership by 2020 and double it again by 2035 o Expanding Bus Rapid Transit and regional bus service o Enhancing TOD planning and 1st-mile-last-mile investments near Metrolink stations o Doubling the bicycle network to 24,000 miles and improving pedestrian environment	Comment noted. The 2012 RTP/SCS contains three new commuter rail lines, six new rapid bus lines, and an expansion of point to point express bus service. The plan forecasts a 338% rise in commuter rail boardings between 2001 and 2035. Land use policy around transit stations also calls for first/last mile investments.
088-08	Dolores Gonzalez-Hayes	Latino Health Access	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.	Comment noted. SCAG cannot unilaterally change the near term commitments that are already in place. Significant increase in funding for active transportation proposed in the 2012 RTP/SCS is largely predicated on additional revenues from new sources that will require future actions at the state and/or federal levels. Therefore, the plan realistically assumes that these funds will not be available in the near term. The earliest these funds are expected to be available is 2026. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards regional Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending

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				on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluate funding for Active Transportation and pursue new funding sources in future RTP updates. SCAG is committed to assisting local jurisdictions with the development, implementation, and maintenance of their active transportation plans.
088-09	Dolores Gonzalez-Hayes	Latino Health Access	Increase investments in zero emission freight transportation in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards. Ensure that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies and infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially those living along the freight corridor.	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission (or near zero-emission) trucks. SCAG also continues to support efforts by regional partners to address goods movement emissions and impacts on communities. Further clarification has been provided in the RTP text regarding funding for demonstration and initial deployment of zero/near zero-emission technologies.
088-10	Dolores Gonzalez-Hayes	Latino Health Access	Evaluate the number and type of new developments that could be located in close proximity to freeways and high traffic roadways in the SCAG region under the new RTP. Work with air district, health departments and universities to develop and implement best practice policies for developments located near heavy traffic areas to reduce exposures to air pollution.	Comment noted. SCAG prepared additional analysis to highlight the emissions exposure in areas within 500 feet of freeways and high volume roads. It should be noted that the level of emissions near these facilities is higher than in the region as a whole. In 2035 these areas still will have higher emissions than the region as a whole. However, while regional emissions overall decrease, the rate of decrease between now and 2035 near freeways and high volume roads is even greater. The RTP/SCS does result in an increase in population in these locations, and as such health risk is higher for these individuals than if they were not in the buffer area. As such, subsequent project level analysis and mitigation should be cognizant of on-going health concerns. However, the plan as a whole shows benefits for emissions exposure and decreased levels of risk in areas near freeways.
088-11	Dolores Gonzalez-Hayes	Latino Health Access	As health and medical organizations and professionals, we recognize that strong government policies to control harmful emissions and that dramatically increase options for active transportation are critical to improving public health and quality of life in Southern California. We stand ready to assist you in implementing a truly health protective, equitable and sustainable plan for Orange County and all of Southern California.	Comment noted.
089-01	Jackelyn	Los Angeles	Thank you for the opportunity to comment on the 2012 Draft	Comment noted. The reference to wages, in the Economic and

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	Cornejo	Alliance for a New Economy	Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We have specific concerns regarding statements and recommendations made in the document regarding how transportation improvements can increase economic competitiveness in the SCAG region. LAANE is an advocacy organization dedicated to building a new economy for all. Combining dynamic research, innovative public policy and the organizing of broad alliances, LAANE promotes a new economic approach based on good jobs, thriving communities and a healthy environment. We strongly believe that infrastructure investment is crucial to our region's economic recovery and to increase mobility options for workers. However, at the same time families should earn middle-class wages, with health and pension benefits, as it also essential to stimulating our economy. Solid infrastructure investment and good jobs go hand-in-hand in being able to maximize public investment. We find it very troubling that an agency, such as SCAG, would recommend or suggest that lowering workers' wages would make the region more economically competitive, as stated in the Economic and Job Creation Analysis Appendix. Public investment that is tied to increasing worker standards; workforce training programs and targeting communities disproportionately affected by poverty and unemployment will make us more economically competitive. SCAG should look towards models already existing, for example in Los Angeles County, to guarantee efficiency in infrastructure projects and put people back to work.	Job Creation Analysis "How Transportation Improves Economic Competitiveness," number 2 was not intended to be a policy statement on wages. The information was intended to explain the economic impact modeling results. Clarifying language will be added.
089-02	Jackelyn Cornejo	Los Angeles Alliance for a New Economy	Draft Analysis Comments 1. On Page 8, the draft Economic and Job Creation analysis states: SCAG could take this recommendation one step forward by identifying strategies which ensure the creation of good-middle class job creation and project delivery. One such tool are Project Labor Agreements (PLAs), in which public agencies can use to attract a highly-skilled workforce to complete construction projects on-time and on-budget. PLAs, used in both the public and private sector, are pre-bid, collective-bargaining agreements between a developer (or agency) and the construction trade unions to set out wages, standards and benefits for workers on a construction project. In exchange, both parties agree to refrain from strikes or lockouts. Because they are traditionally used on large-scale, multi-year	Comment noted.

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			projects, they provide excellent opportunities to develop jobs programs for communities. LAANE has pushed for a more comprehensive approach by advocating for Construction Careers Policies, which combine a PLA and a targeted hire program, which requires contractors to set aside a percentage of construction jobs to individuals who live in communities most affected by high unemployment and poverty, and with barriers to employment, PLA are an increasingly popular project delivery tool in the SCAG region. Construction Careers policies have been approved at the following agencies: City of Los Angeles Community Redevelopment Agency, City of Los Angeles Department of Public Works and Port of Los Angeles. Recently, Construction Careers Policies have been applied to transportation-related construction projects. In March 2011, the Exposition Line Construction Authority passed such a policy for Phase II of the light rial project. In January 2012, the Los Angeles County Metropolitan Transportation Authority Board of Directors unanimously approved an agency-wide policy that includes a PLA and targeted hire program for projects greater than $2.5 million, which includes many projects funded by Measure R. Metro is the first transit agency in the country to approve such a policy. This approach can serve as a valuable tool for transit agencies throughout the SCAG region that are dealing with the twin problems of congestion and unemployment. In February 2011, the Federal Transit Administration approved the use of targeted hire on projects receiving federal dollars. The FTA approval sets a national precedent for targeting disadvantaged workers on transit projects.	
089-03	Jackelyn Cornejo	Los Angeles Alliance for a New Economy	2. "How Transportation Improves Economic Competitiveness" Section (P.8) This section of the draft plan analysis "outlines five paths through which transportation improvements can increase regional economic competitiveness." We find it troubling that SCAG suggests that, under number 3, "Reduced Congestion Reduces Employees' Asking (or Reservation) Wage." It states, "Metropolitan areas, all else equal, lure more migrants into the region due the amenity value of lower traffic congestion. This increases the supply of available labor, driving wages down." These statements suggest that congestion reduction alone would encourage people to move into the SCAG region, as	Comment noted. The reference to wages, in the Economic and Job Creation Analysis, How Transportation Improves Economic Competitiveness, was not intended to be a policy statement on wages. The information was provided to explain the economic impact modeling results. SCAG has collaborated and worked closely with public and private sector leaders throughout the development of the 2012 RTP/SCS. For example, the Global Land Use & Economic Council with representatives from private sectors including Southern California Leadership Council, LAEDC, Orange County Business Council and Inland Empire Economic Partnership developed an Economic and Job Creation Strategy

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			opposed to other more essential factors such as major industries that are rooted in the local economy --- goods movement, tourism, construction, entertainment, etc. We should be looking to strengthen industries that are vital to our economy, not creating low-road career options for residents. It is also highly problematic to have a policy objective to lower wages when the SCAG region has high levels of poverty, unemployment, sluggish growth, and high levels of income inequality. SCAG has provided an analysis that essentially implies that lowering wages are a benefit to the region, and that the agency can help achieve that through the 2012 RTP congestion reduction interventions, projects and policies. For example, the SCAG region: ranked last in average wage per job at about $44,379 among the nine largest metropolitan areas, has the highest poverty rate among the nine largest metropolitan regions in the nation, and in 2006, had the highest housing cost burden among the nine largest metropolitan regions in the nation, with 53 percent of owner households paying 30 percent or more of their incomes on housing. The seven counties that are part of the SCAG region are grappling with significant challenges that have been further exacerbated by the recession. When workers spend less on transportation costs, a benefit of reduced congestion, they are able to spend their earnings in other ways, stimulating the regional economy. Given that housing prices in the SCAG region, especially in Los Angeles County, are very high, congestion reduction alone will not address affordability and supply, and how current income earnings play a role in where workers choose to live.	and was adopted by SCAG's Regional Council in June 2011. One of the Strategy's emphases is on retaining and growing jobs in the region's key industries.
089-04	Jackelyn Cornejo	Los Angeles Alliance for a New Economy	We suggest the following recommendations be considered in revising the RTP: Delete language in the 2012 RTP/SCS or appendices that suggest that lower wage rates in the SCAG region are a benefit of congestion reduction strategies included in the plan; Include tools, such as project labor agreements with targeted hire, that allow government agencies to ensure that investment in transportation infrastructure also creates middle-class careers, especially in construction; Include an analysis on what the economic benefits of congestion reduction in improving the quality of life of workers in the SCAG region, which includes how the diversion of earnings from transportation costs to other vital services and industries can	Comment noted. The reference to wages, in the Economic and Job Creation Analysis, How Transportation Improves Economic Competitiveness, was not intended to be a policy statement on wages. The information was provided to explain the economic impact modeling results.

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			stimulate our economy. We hope that the agency takes these recommendations seriously and develops a blueprint for the region that improves the quality of life of working families through effective infrastructure investment and the creation of good middle-class career opportunities.	
090-01	Alexis Lantz	Los Angeles County Bicycle Coalition	It is critical that the 2012 RTP set tangible and measurable goals to improve the safety of all community members, especially our most vulnerable road users, those walking and bicycling. We are concerned that the SCAG staff report to the Regional Council and Policy Committees, dated October 20th, failed to provide measurable goals in regards to Safety and Active Transportation. We encourage SCAG to be specific as to how the 2012 RTP/SCS will improve the safety of people walking and bicycling and how SCAG and the six County Transportation Commissions can work to address and achieve policies listed such as: "making transit more bike friendly" and how to "encourage implementation of a Complete Streets policy across the region," (as stated on page 11 of 10/20 staff report). Creating a more multimodal transportation network in the SCAG region requires the RTP to be specific about how investments in active transportation will be funded, planned, prioritized, measured and developed in collaboration with partners and interested stakeholders. With those key principles in mind, we respectfully submit the following recommendations for your consideration:	Comment noted. Please see the Transportation Safety Appendix which recommends 69 actions for local governments and complement the 152 actions in the California Strategic Highway Safety Plan.
090-02	Alexis Lantz	Los Angeles County Bicycle Coalition	1. Fund: Increase Funding Levels for Bicycle and Pedestrian Infrastructure: Currently close to 21 percent of all trips in the SCAG Region are done via walking and bicycling (2009 National Household Travel Survey) and 25 percent of all SCAG roadway injuries and fatalities are pedestrian and bicyclists (2008 SWITRS). The Region's last RTP, adopted in 2008, allocated only 0.46 percent of its total funding for these modes.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
090-03	Alexis Lantz	Los Angeles	We respectfully request that the 2012 RTP includes strategies to	Comment noted. The 2012-2035 RTP/SCS allocates

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		County Bicycle Coalition	significantly increase the proportion of funds allocated to active transportation so that over time, such funding reflects the proportion of trips made by walking and biking.	approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
090-04	Alexis Lantz	Los Angeles County Bicycle Coalition	We recommend the following: Preliminary estimates show a funding need in the range of $22B to $36B throughout the life of the 2012 RTP to fund the build-out of high priority pedestrian and bicycle investments as identified by local jurisdictions. Given the mode split, safety and collision trends, public health concerns and many other co-benefits we recommend that 5-8 percent of the 2012 RTP fund active transportation projects.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
090-05	Alexis Lantz	Los Angeles County Bicycle Coalition	All future SCAG Regional Transportation funding strategies should allocate 10 percent of all revenue towards walking and biking improvements and investments to help meet the unmet funding gap for active transportation.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation

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				and pursue new funding sources in future RTP updates.
090-06	Alexis Lantz	Los Angeles County Bicycle Coalition	Recommend the formation of an Active Transportation Funding Committee to assist in the next six months while the RTP continues its development and scheduled adoption in May 2012.	Comment noted.
090-07	Alexis Lantz	Los Angeles County Bicycle Coalition	We recognize going from 0.46% to 5%-8% is a significant jump in investments, however we maintain that there is tremendous unfunded need to make our streets safer and usable for all users. Many from around the region would be interested in assisting with identifying strategies for unmet active transportation funding needs, as we would be happy to play a leadership role in this Committee.	Comment noted.
090-08	Alexis Lantz	Los Angeles County Bicycle Coalition	Plan and Economics: Integrate Bicycle and Pedestrian Improvements into all Transportation System Preservation Projects: Road maintenance and the first and last mile connections to transit are crucial for creating a connected and sustainable transportation system. System preservation is inherently important to people walking, biking, and connecting to transit; there needs to be enhancements for complete streets - ensuring that when maintenance opportunities arise or are scheduled, that the region is leveraging its limited resources to enhance our multi-modal transportation network. Currently the potential benefits to of the Transportation System Preservation category fail to address how these investments will improve the safety and access of people walking and biking - it only outlines benefits to drivers.	Comment noted. The Active Transportation appendix identifies the need for active transportation considerations for all transportation planning programs.
090-09	Alexis Lantz	Los Angeles County Bicycle Coalition	Therefore we recommend: Embed a Complete Streets Policy within the Transportation System Preservation category that requires any investments into system preservation on surface streets include improvements for pedestrians and bicyclists, and those accessing transit. Funding for Transportation System Preservation of highways needs to include bicycle and pedestrian safety improvements at on/off ramps to ensure greater safety of people using those modes of surface streets that connect with ramps and help knit communities, that have been adversely impacted by freeway on and off ramps, back together. Adopt a Complete Streets checklist that requires County Transportation Commissions to demonstrate how each project is addressing all modes. This checklist should be included in the 2012 RTP to be implemented in 2014. This will	Comment noted. Goal 3: Increase Active Transportation Usage in the SCAG Region, Objective 3.2 Adoption of a Complete Streets Policy includes two policies 1) Encourage local jurisdictions to prioritize and implement projects/policies to comply with ADA requirements; and 2) Encourage local jurisdictions to develop and implement Complete Streets Policies.

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			assist in prioritizing projects that are critical in achieving regional goals.	
090-10	Alexis Lantz	Los Angeles County Bicycle Coalition	Plan: Do Bicycle and Pedestrian Planning: Improving the walking and biking environments in our region cannot be done without adequate planning at the local level. Unfortunately, many SCAG cities do not have bicycle or pedestrian master plans; in Los Angeles County, for example, only approximately 11 of 88 cities have bicycle master plans and four cities have pedestrian plans. Additionally, current station area plans fail to take into account the first and last mile of transit trips, which are usually done on foot or by bicycle. This lack of planning is a significant impediment to improving infrastructure for people who rely on bicycling and walking to connect to transit, work, school, and their daily needs. As such we recommend: Expand the Compass Blueprint program to support SCAG cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans. It is estimated that it would require approximately $200,000 per city to develop these plans (95 cities at $200,000). Identify and secure funding sources in order to set aside at least $19M in the 2012 RTP to support these planning efforts. Establish a goal of 50 percent of SCAG cities having completed at least one plan by 2016 in order to prepare for the 2016 RTP.	Comment noted. SCAG is committed to working with all member counties and cities to develop bicycle and walking plans and policies. SCAG will work with local jurisdictions in the development of Pedestrian Safety Action Plans (PSAPs) by conducting workshops; and assist with the development and maintenance of their local active transportation plans. SCAG may consider expanding the Compass Program to support active transportation plans in the future.
090-11	Alexis Lantz	Los Angeles County Bicycle Coalition	Prioritize: Safety and Equity: Bicyclists and pedestrians account for 25% of all roadway fatalities and injuries in the SCAG Region (2008 SWITRS), yet these modes are currently receiving less than 0.46% of all available funding (2008 SCG RTP).	Comment noted. Goal 1 of the Active Transportation appendix is to decrease bicyclist and pedestrian fatalities and injuries by working with local jurisdictions to support a safe transportation environment in the SCAG region.
090-12	Alexis Lantz	Los Angeles County Bicycle Coalition	Studies also show that a disproportionate amount of those injuries and fatalities occr in low-income communities (Traffic Injury Prevention 09/11). It is critical that we are doing all we can to ensure safety for all community members, regardless of where they live or how they travel. Earlier this month, the Los Angeles Times wrote a compelling article on 2 young girls walking to school who were severely injured when a car struck them. It is imperative that our transportation plans are doing all they can to make sure these tragedies, and the high number in which they occur in the SCAG region, end.	Comment noted. Goal 1 of the Active Transportation appendix is to Decrease Bicyclist and Pedestrian Fatalities and Injuries. SCAG will work with local jurisdictions to support a safe transportation environment in the SCAG region, by working with local jurisdictions to provide comprehensive education for all road users, direct enforcement agencies to focus on bicycling and walking safety to reduce multi-modal conflicts, and partner with local advocacy groups and bicycle related businesses to provide bicycle-safety curricula to the general public.
090-13	Alexis Lantz	Los Angeles County Bicycle Coalition	For these reasons, we recommend that the RTP take the following steps to increase safety and equity: Analyze bicycle and pedestrian collision data to understand where high rates of	Comment noted. In the Transportation Safety Appendix, the top 5% collision locations in the SCAG region are noted for State Highways, interchanges and local (non-state) roadways. In

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			collisions in the six-county region are happening and if collision rates are increasing or decreasing each year.	addition, SCAG had obtained the collision data collected by the California Highway Patrol as part of the Statewide Integrated Traffic Records System and geocoded to better analyze hot-spot locations where collisions involve bicyclists and pedestrians.
090-14	Alexis Lantz	Los Angeles County Bicycle Coalition	SCAG staff should present a yearly report to the SCAG Board to help inform the public and the Board on the state of walking and bicycling safety, and Safe Routes to School programs in the region.	Comment noted. SCAG will consider reporting on a periodic basis.
090-15	Alexis Lantz	Los Angeles County Bicycle Coalition	Many of the counties in the SCAG region are working to support local efforts and investments - these projects are increasing safety and improving the mode split, and addressing community concerns.	Comment noted.
090-16	Alexis Lantz	Los Angeles County Bicycle Coalition	The RTP should set a goal of working towards zero deaths and should prioritize improve the safety of all transportation modes.	Comment noted. Goal 1 of the Active Transportation appendix is to Decrease Bicyclist and Pedestrian Fatalities and Injuries. SCAG will work with local jurisdictions to support a safe transportation environment in the SCAG region, by working with local jurisdictions to provide comprehensive education for all road users, direct enforcement agencies to focus on bicycling and walking safety to reduce multi-modal conflicts, and partner with local advocacy groups and bicycle related businesses to provide bicycle-safety curricula to the general public.
090-17	Alexis Lantz	Los Angeles County Bicycle Coalition	Utilize Transportation Injury Mapping System (TIMS) in the 2012 RTP. Allocate greater resources to cities with little or no bicycle/pedestrian infrastructure and/or plans, high rates of collisions (using TIMS data), and significant populations of low-income residents. Identify these communities in the 2012 RTP in order to allocate resources for technical assistance and prioritize planning and infrastructure resources. Expand the "Toolbox Tuesdays" programs to include bicycle safety design, pedestrian safety design, ADA design, and training on how to use the TIMS program for staff from the 190 SCAG cities, to expand understanding of where collisions are happening, how to improve the safety for people walking and bicycling, and enhance local jurisdiction HSIP, SRTS, and other grant opportunity applications.	Comment noted. In the Transportation Safety Appendix, the top 5% collision locations in the SCAG region are noted for State Highways, interchanges and local (non-state) roadways. In addition, SCAG had obtained the collision data collected by the California Highway Patrol as part of the Statewide Integrated Traffic Records System and geocoded to better analyze hot-spot locations where collisions involve bicyclists and pedestrians. In addition, SCAG will work with local jurisdictions to support a safe transportation environment in the SCAG region, by working with local jurisdictions to provide comprehensive education for all road users, direct enforcement agencies to focus on bicycling and walking safety to reduce multi-modal conflicts, and partner with local advocacy groups and bicycle related businesses to provide bicycle-safety curricula to the general public.
090-18	Alexis Lantz	Los Angeles County Bicycle Coalition	Measure: Conduct Pedestrian & Bicycle Usage Counts: We must increase documentation of bicycle and pedestrian usage and demand by regularly assessing numbers of people walking and biking. Without such figures, it is difficult to forecast usage or measure the positive benefits of investments in these modes.	Comment noted. SCAG has identified that improved data collection regarding pedestrian and bicycle trip characteristics, facility conditions, and injuries and fatalities is necessary to develop a clear understanding of active transportation conditions. SCAG acknowledges that this data collection is

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				necessary to improve decision makers' understanding of the deficiencies and needs within the existing active transportation system.
090-19	Alexis Lantz	Los Angeles County Bicycle Coalition	Create and fund a regional bicycle and pedestrian count program at SCAG establishing yearly usage counts at key locations in cities throughout the SCAG region.	Comment noted.
090-20	Alexis Lantz	Los Angeles County Bicycle Coalition	Use the data collected to establish trends, set goals, evaluate fund requests for facility improvements, prioritize improvements, and show the impacts of recent improvements. Set aside funds in SCAG's 2012/2013 OWP to create and maintain this program in future years.	Comment noted.
090-21	Alexis Lantz	Los Angeles County Bicycle Coalition	The RTP should set a target for increasing the amount of all trips made by bicycle and the amount of walking to transit trips (measuring the 1st/last mile).	Comment noted. Goal 3 of the Active Transportation Appendix is to increase Active Transportation usage in the SCAG Region by adopting a Safe Routes to School Policy and a Complete Streets Policy.
090-22	Alexis Lantz	Los Angeles County Bicycle Coalition	Collaborate: Review Local Input, Provide Opportunities for Stakeholders to Engage and Incorporate Feedback: There are growing voices all over the six county SCAG region in support of safe walkable and bikeable neighborhoods for users of all ages and abilities. Safe Routes to School programs and investments is an example of a broad spectrum program that while focusing on improvements to ensure the safety of our youth, ultimately benefits the whole neighborhood.	Comment noted. SCAG is committed to working with stakeholders to develop a safe active transportation program throughout Southern California.
090-23	Alexis Lantz	Los Angeles County Bicycle Coalition	Many of these individuals, community members, professional - and more, have concerns about the fundamental change needed in our region.	Comment noted.
090-24	Alexis Lantz	Los Angeles County Bicycle Coalition	SCAG conducted valuable and well run workshops this summer, and we commend those efforts, however we are concerned there has not been a report compiled and presented on the feedback received in those workshops. We understand SCAG staff is working on this. We urge these findings to be shared in a timely manner with the Board, so that they may understand their constituents. We ask that the staff to report on what was heard and how these comments are addressed in the draft 2012 RTP.	Comment noted. Feedback received during the summer 2011 workshops was analyzed and presented to SCAG's Joint Policy Committees and Regional Council later in the fall for the purposes of developing the Draft 2012 RTP/SCS.
090-25	Alexis Lantz	Los Angeles County Bicycle Coalition	We recognize there is a significant increased level of investments and policies outlined in this document, this is built on the demand, interest and support for active transportation happening all over the SCAG region. With increased	Comment noted.

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			opportunities for stakeholders to weigh in on the Region's Transportation Plan, we believe this will strengthen the RTP and its ability to be successfully implemented over the coming years.	
091-01	Tracy Rafter	Los Angeles County Business Federation	For the past three years, business and industry representatives from throughout Southern California have participated in the Southern California Association of Government's extensive process used to develop the region's Draft 2012 Regional Transportation Plan (RTP), which includes an inaugural Sustainable Communities Strategy (SCS). Our interest in this process has been particularly keen given both the significant economic challenges currently facing our region's economy and the fact that the inaugural SCS could - if not considered from many viewpoints - have unforeseen negative consequences. In light of our ongoing participation and understanding, we appreciate the tremendous effort that SCAG's staff and leaders have put into the process that led to the Draft 2012 RTP/SCS & PEIR. The development of this RTP/SCS followed an inclusive approach with SCAG holding hundreds of meetings with SCAG's public and private stakeholders. We also appreciate the extensive economic analysis that SCAG has performed on the Draft RTP/SCS in order to provide all stakeholders and SCAG's Regional Councilmembers with an understanding of the financial impacts of the plan. As representatives of Southern California's broader business community, we recognize the crucial roles that transportation and infrastructure have in maintaining our region's economy and quality of life. Accordingly, through this letter, we join together to provide SCAG with general comments regarding remaining significant concerns about the contents of both (i) the Draft 2012 RTP/SCS, and (ii) the Draft Program Environmental Impact Report (PEIR).	Comment noted.
091-02	Tracy Rafter	Los Angeles County Business Federation	Foster economic growth and job creation in a balanced and accountable manner and in recognition of foreseeable regional population growth;	Comment noted. Please see Regional Goals on page 13 of Chapter 1, Vision.
091-03	Tracy Rafter	Los Angeles County Business Federation	Utilize all revenue sources very efficiently, and utilize new revenue sources only if they are economically sound and equitable;	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better

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				reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
091-04	Tracy Rafter	Los Angeles County Business Federation	Honor the prerogatives that local governments – as the level of government with the greatest understanding of and sensitivity to community interests and context – should continue to enjoy concerning land use and community development;	Comment noted. SCAG based the growth and land use assumptions in the RTP/SCS on input received from each of our 197 local jurisdictions. In some cases, SCAG altered small area land use assumptions (within jurisdictional boundaries) to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.
091-05	Tracy Rafter	Los Angeles County Business Federation	Comply with the California Environmental Quality Act (CEQA) and federal environmental laws and regulations (e.g., federal Clean Air Act conformity); and - Allow for expeditious review and approval of projects that are consistent with a sound and reasonably accommodating RTP/SCS.	Comment noted. The RTP/SCS and its PEIR comply with all requirements including SAFETEA-LU, the California Regional Transportation Plan Guidelines, SB 375 and CEQA.
091-06	Tracy Rafter	Los Angeles County Business Federation	Turning to the substance of the RTP/SCS as a policy matter, we have the following additional general comments: 4) The RTP/SCS is undergirded by analysis which shows the dispersion of populations and employment shown and categorized at the level of sub-jurisdictional "transportation analysis zones" (TAZs). The TAZ level of detail is, we believe, too small and precise a level at which to prescribe the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. Page 148 of the SCS should therefore be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or sub-regional level, not at a TAZ	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			level.	
091-07	Tracy Rafter	Los Angeles County Business Federation	5) The RTP/SCS should aim to reflect and accommodate both the short-term future of the SCAG region and its longterm future. For example, the RTP should better anticipate the need for and reasonable likelihood of a gradual transition in the region's overall vehicle fleet (e.g., gradually towards alternative fuels) and the ongoing need for enhancements to vehicular mobility even as more mass transit comes to fruition.	Comment noted. The 2102 RTP is a long range planning document that accounts for vehicle fleet turnover and presents both near-term and long-term strategies to address the on-going need for enhanced mobility in all transportation modes.
091-08	Tracy Rafter	Los Angeles County Business Federation	6) More detail, clarity and explanation are needed concerning the new revenue sources that are outlined within the plan document. New revenues account for $219.5 billion out of the total $524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS). To fully and fairly evaluate these proposals, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following: a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement. b. The new revenue sources within the RTP must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
091-09	Tracy Rafter	Los Angeles County Business Federation	8) In the RTP, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system. It would be helpful for SCAG to state clearly in the RTP that, to date, stakeholders have not reached consensus on technologies, timing, funding,	Comment noted.SCAG clearly recognizes the significant contribution of the goods movement sector to the regional and state economy. We concur that any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, and reliability of the goods movement system. Further clarification concerning technology development, stakeholder involvement, and funding has been provided in the text of the RTP. SCAG will continue to work with all goods movement stakeholders in further evaluating technology options.

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			or emissions impacts of the various options that SCAG examined in the RTP. For example, SCAG discusses long-term steps towards a "Zero Emissions Container Movement System" (ZECMS). If SCAG chooses to pursue such a fundamental shift in new technology, it would need to work with all goods movement stakeholders to clearly establish whether and, if so, when and where within the transportation infrastructure a ZECMS option could be demonstrated and evaluated without negatively effecting the velocity and throughput of the system.	
091-10	Tracy Rafter	Los Angeles County Business Federation	9) With the recent elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is challenged, given the costs related to aging or inadequate infrastructure capacity and high development costs for higher density projects. The elimination of redevelopment agencies also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. In fact, since the passage of SB 375, the State of California has stripped local governments of funds that were previously available for transit, transportation and redevelopment. This follows many years in which the state diverted revenues from gasoline, sales, income and other taxes needed for local government programs. Local governments cannot help to fulfill the 2012 RTP/SCS without increased, not decreased, state support. SCAG should emphasize the need for the state to restore support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to speed the attainment of mandated goals. While we find many very positive aspects in the plan, especially related to principles and direction, these significant issues need to be addressed. The short list of general concerns set forth above is not meant to be exhaustive. Many of the organizations that subscribe to the above-stated comments will be commenting more robustly in separate writings. We join here, however, to express our unity in finding the Draft 2012 RTP/SCS and PEIR to be in need of significant clarification and correction. We are also jointly committed to completing this process and, over the remaining weeks, working closely with SCAG to develop and adopt a smart, flexible, accountable, and economically sound RTP/SCS.	Comment noted. SCAG conditioned acceptance of the SB 375 regional targets on 11 recommendations aimed primarily at restoring previous levels of state funding for transportation. We also included mileage-based user fee and adjustments to state and federal gas excises taxes to detail specific steps necessary to stabilize state and federal transportation revenue sources, which will help ensure we have adequate resources to meet state and federal mandates.
091-11	Tracy Rafter	Los Angeles	7) New revenues from fees on businesses operating in the SCAG	Comment noted. The RTP does not assume the implementation

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		County Business Federation	region – and particularly the "Freight Fee/National Freight Program" listed on page 96 of the Draft RTP – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region's competiveness will be compromised.	of local, regional, or statewide freight fees. Ensuring that the SCAG region or its member entities are not an economic disadvantage were critical considerations used in the development of all funding proposals included in the RTP.
091-12	Tracy Rafter	Los Angeles County Business Federation	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 77.
092-01	Jean Armbruster	Los Angeles County Department of Public Health	We applauded SCAG for a job well done and embrace the many aspects of the RTP which will improve public health including expanding public transit, reducing , increasing bike pad funding, and I'm very excited to hear from the presentation increasing bike pad planning, that's really good news.	Comment noted.
092-02	Jean Armbruster	Los Angeles County Department of Public Health	To support SCAG in making resource allocation decisions our department developed an estimate suggestive of the need for bike and pedestrian improvements in the SCAG region. This was actually a very lengthy analytical process, we reviewed the cost data in existing cities bike and pedestrian plans in L.A. County and the Caltrans _____ disclosed grants in L.A. County. We looked at the cost of sidewalk repairs in the City of Los Angeles which is quite significant. We also looked at the cost for building pedestrian and bicycle improvement in transit oriented districts which is all about the First Miles, Last Mile issue. We then used this data to extrapolate the needs for the entire region. Given that this bike and pedestrian plans have a range of cost for proposed improvements we actually looked at a corresponding range for the cost of active transportation funding. We came up with low of 37 billion to a high of 60 billion over twenty give years and this is adjusted for inflation as per the RTP. This is not a recommendation for funding, but we do feel like given the region's long standing under investment in bike and pedestrian infrastructure and over investment in highways, arterials, etc., that we really need to be thinking about this as an appropriate range for investment options in the RTP. An investment of this magnitude could yield for our region basic bike and pedestrian infrastructure in key areas of every city in the SCAG region. It could yield bikeable and walkable neighborhoods within a half mile of all transit oriented districts existing. It could yield public schools throughout the region that children can walk and bike	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates. SCAG is committed to working with local jurisdictions to develop an active transportation friendly environment throughout the SCAG region.

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			to. Sidewalks that are repaired throughout the region and improved continuity in county bike networks.	
092-03	Jean Armbruster	Los Angeles County Department of Public Health	Our recommendations for the RTP include: • Front loading the act of transportation funding so it is available early on to jurisdictions in the twenty-five year period.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.
092-04	Jean Armbruster	Los Angeles County Department of Public Health	• Targeting active transportation investments in TOD's creating First and Last Mile connections to transit.	Comment noted.
092-05	Jean Armbruster	Los Angeles County Department of Public Health	Targeting investments to close the GAP's in the key bike pad corridors.	Comment noted. The 2,012.2 mile SCAG Regional Bikeway Network aims to close gaps in specific regional corridors that may be used to increase bicyclist mobility and connectivity within the SCAG region.
092-06	Jean Armbruster	Los Angeles County Department of Public Health	• Providing funding and technical assistance for cities to create bike and pedestrian plans and to build out those plans.	Comment noted. SCAG is committed to providing local jurisdictions with assistance in the development and implementation of their active transportation plans.
092-07	Jean Armbruster	Los Angeles County Department of Public Health	• Funding jurisdictions to create TOD plans to provide incentives for housing and business, to low income people, and to prevent displacement of existing low income tenants.	Comment noted. Although the analysis related to gentrification and displacement is inconclusive, SCAG will include potential resources to address gentrification in the Final EJ appendix. We look forward to continuing to work with EJ stakeholders and would encourage these projects to apply for funding through Compass Blueprint.
092-08	Jean Armbruster	Los Angeles County Department of Public Health	• Citing housing and other sensitive use development far enough away from sources of pollution to decrease exposures that can negatively affect health.	Comment noted. There is substantial information and analysis on health risks related to air pollution from transportation infrastructure included in both the Environmental Justice Appendix and in the Program Environmental Impact Report. Staff will provide further analysis in the final RTP, in response to several comments.
092-09	Jean Armbruster	Los Angeles County Department of Public Health	• Integrating complete streets into all transportation projects and including health criteria when improving projects.	Comment noted. The Active Transportation appendix supports the concept of Complete Streets. Goal 3: Increase Active Transportation Usage in the SCAG Region, Objective 3.2 Adoption of a Complete Streets Policy includes two policies 1) Encourage local jurisdictions to prioritize and implement projects/policies to comply with ADA requirements; and 2) Encourage local jurisdictions to develop and implement

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				Complete Streets Policies.
092-10	Jean Armbruster	Los Angeles County Department of Public Health	• Measuring how benefits of transportation plans and incorporating health performance metrics and health outcomes into SCAG's modeling	Comment noted. SCAG is currently in the process of enhancing our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016.
092-11	Jean Armbruster	Los Angeles County Department of Public Health	• Adopting transportation policies that discourage people from driving and include strategies such as congestion pricing and incentives for non-auto forms of transportation.	Comment noted. SCAG's Transportation Demand Management Appendix includes recommendations to entice travelers out of single occupancy vehicles, including first-mile/last-mile strategies, rideshare, active transportation and telecommuting. The Congestion Management Appendix includes a toolbox containing various TDM/TSM strategies and performance metrics.
093-01	Richard Bruckner	Los Angeles County Department of Regional Planning	We are concerned that the Draft RTP/SCS states that the growth forecast is based on local input. The overall land use pattern maps for Los Angeles County (Part A of the SCS background documentation appendix of the SCS Chapter) reflect land use patterns that are not part of the County's local input. In particular, the land use pattern for the northwest corner of the unincorporated Antelope Valley reflects significant growth by 2020. A review of the TAZ level socioeconomic data for that area shows projections of over 10,000 new households by 2020, and over 22,000 new households by 2035. The area is a greenfield designated Non-urban by the Antelope Valley Area Plan. The area also consists of environmental and hazard constraints. Another concern is the land use pattern in Unincorporated Rowland Heights, and unincorporated South Diamond Bar along SR-57, particularly the designation of this as a HQTA by 2035. This area is vacant, designated open space or low density, and also consists of hazard and environmental constraints.	Comment noted. SCAG's growth forecasting process and results are primarily based on the bottom-up local input process. SCAG also reviews regionally significant projects through the Intergovernmental Review (IGR). Based on the information received from the IGR projects, SCAG evaluates and incorporates the growth from those IGR project areas to assess their impacts on the regional transportation system. SCAG will add to the 2012 RTP/SCS Growth Forecast Appendix the description of how to evaluate and incorporate the significant IGR projects into small area socioeconomic database from the 2008 RTP growth forecast report.
093-02	Richard Bruckner	Los Angeles County Department of Regional Planning	It is our understanding that SCAG assumed growth within these areas based on knowledge of pending large-scale projects through the CEQA IGR process. The assumption of growth based on pending individual projects is not explicitly described in the Draft RTP/SCS as part of SCAG's growth forecast methodology. In addition, assuming growth based on individual and pending	Comment noted. SCAG reviews regionally significant projects through the Intergovernmental Review (IGR Based on the information received from the IGR projects, SCAG evaluates and incorporates the growth from those IGR project areas to assess their impacts on the regional transportation system. SCAG will add to the 2012 RTP/SCS Growth Forecast Appendix the

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			projects is of concern given the uncertainty of projects that have not been considered by a decision making body and he public, and the significant time and complex issues entailed in processing large scale projects. The projects mentioned above will require legislative acts by the LA County Board of Supervisors, and this action should not be assumed. In addition, assuming a pending project in the growth forecast puts local governments in a difficult position and causes confusion when the project is actually considered for public hearing. Furthermore, as large-scale projects are often built in phases, assuming full build-out for an individual project within the horizon of the RTP may not always be appropriate—in particular, assuming over 10,000 new households by 2020 and over 22,000 new households by 2035 in one particular TAZ. These projections are not consistent with historical data. The Antelope Valley absorbs less than 200 new units per year. Even if 100% of the growth were in this one area, these projections would far exceed historic patterns.	description of how to evaluate and incorporate the significant IGR projects into small area socioeconomic database from the 2008 RTP growth forecast report.
093-03	Richard Bruckner	Los Angeles County Department of Regional Planning	Given the outlined concerns, we recommend the following amendments to the Draft 2012 RTP/SCS: 1. Amend the Overall Land Use Pattern maps and adjust the associated TAZ-level socioeconomic data to redistribute the growth assumed to occur due to pending large scale IGR projects to areas where the County encourages growth in the General Plan Update, such as Transit Oriented Districts; and 2. As an alternative to using pending large scale IGR projects to inform growth distributions in the Draft RTP/SCS, add a separate section to the Draft RTP/SCS that acknowledges pending large-scale IGR projects throughout the SCAG Region and their potential to impact future growth forecasts upon approval and adoption by the local jurisdiction. Consistency between the General Plan Update and Draft RTP/SCS is an important part of advancing the goals of the RTP/SCS at the local level. We acknowledge that several large projects are in the entitlement process, and at the time projects are approved it would be appropriate to amend the RTP/SCS.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level. SCAG will work with local jurisdictions going forward on small area growth distributions.
094-01	Lori Abrishami	Los Angeles County Metropolitan Transportation	We commend SCAG for the significant and unprecedented outreach to MTA, sub-regional agencies, and the public in the development of the Draft 2012 RTP/SCS. We also acknowledge the extensive and dedicated effort on the part of SCAG to craft a	Comment noted. We are grateful for the indispensible role that MTA played in the development of this RTP/SCS and look forward to continuing our partnership beyond the adoption of the RTP/SCS.

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		Authority	Southern California approach to the new SCS requirements of SB 375. We are pleased that the Draft 2012 RTP/SCS has been able to meet both the air quality conformity requirements of the federal Clean Air Act, and greenhouse gas emission (GHGe) reduction requirements necessary to comply with SB 375.	
094-02	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	a) We appreciate the working relationship between SCAG and MTA staff necessary to integrate our 2009 Long Range Transportation Plan (LRTP) projects, programs, and financial assumptions into the Draft 2012 RTP. It appears that the Draft 2012 RTP includes all projects and programs funded by MTA in the 2009 LRTP. We note that SCAG has identified a number of projects and programs that are beyond funding levels of the LRTP. We assume that these projects and programs will be funded through new or innovative funding programs that SCAG has identified in the Draft 2012 RTP as "reasonably available" funding sources over the life of the RTP. Examples of projects beyond the funded LRTP include: East-West Freight Corridor between the I-710 and the I-15; Phase I of the California High Speed Rail Authority (CHSRA), pending an agreement between CHSRA, Metrolink and LOSSAN to identify funds to bring local systems up to high speed (110+ MPH) where possible; A regional Express/HOT Lane Network that expands our Fast Lanes pilot project to include the I-405 and SR-91; Various modal programs, including bus and rail expansion, TDM, TSM, bicycle, pedestrian, and operations and maintenance. b) MTA has proposed and is advocating a program known as America Fast Forward (formerly known as the 30/10 Initiative) to look at federal loan and bonding mechanisms which could accelerate the completion of 12 transit projects in 10 years instead of 30 years. We believe that such a program is beneficial to Southern California counties that have a tradition of self-help local sales tax mechanisms, and that those self-help traditions should be rewarded through new federal bonding or loan assistance programs. Clearly this program would assist the region in the earlier attainment of federal and state air quality conformity and GHGe reduction requirements. We would recommend that a section be included in the Draft 2012 RTP regarding America Fast Forward, and that this section include SCAG policies and actions to partner with MTA and other county transportation commissions to support and advocate for federal enactment of	Comment noted. a) We likewise, appreciate the positive working relationship between MTA and SCAG staff. Your assumptions regarding funding resources for projects and programs beyond the LRTP are correct; we have identified reasonably available sources to support these initiatives. b) America Fast Forward is specifically addressed on page 207 of the Draft RTP and additional language has been added. We are supportive of this effort and will continue to work with MTA and other county transportation commissions to help leverage existing revenue sources and expedite project delivery.

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			this program.	
094-03	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	We note that page 50, paragraph 3 states that “our region has virtually no bus lanes, especially compared to other major metropolitan areas.” We would suggest that this reference be revised to acknowledge that MTA has opened the highly successful Orange Line busway, has federal approval of a Very Small Start Grant to implement bus lanes on Wilshire Blvd, and that the MTA Board has recently directed staff to conduct a countywide transit study to identify a minimum of five additional bus lane candidate projects. Additionally, we have been operating dedicated bus service for some time on the El Monte Busway and on the Harbor Transitway.	Comment noted. The text has been altered to read "Our region has few existing bus lanes, but has implemented the Metro Orange Line, Harbor Transitway and El Monte Busway." Additional candidate corridors will be considered for inclusion in future RTP cycles.
094-04	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	The Transit Policies on page 50 and the SCS chapter make reference to High Quality Transit Opportunity Areas (HQTAs). We would encourage SCAG to identify in the Draft 2012 RTP the specific areas that will be designated as HQTAs and the benefit of this designation.	Comment noted. Appendix: SCS Background Documentation identifies specific areas that are considered HQTAs. There are geographic areas within a half-mile radius of an existing or planned major transit stop or high-quality transit corridor with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute period. Development projects proposed in these areas are subject to potential CEQA relief if they meet a number of defined criteria.
094-05	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	On page 66, in the paragraph on “Logistics activities – including warehouse and distribution facilities”, we would suggest adding that warehouses and distribution centers also perform value-added services to prepare goods for retail sale, such as packaging and adding of accessories. These services also create jobs for the SCAG region.	Comment noted. Warehousing and distribution activities do provide value-added services, well-paying jobs, and upward mobility for regional residents. This is mentioned under the “Continued Expansion of Warehouse and Logistics Activity” bullet point. The point is also more clearly articulated in the Goods Movement Appendix to the 2012 RTP. Further recognition of the impact of value-added services provided by the regional warehousing and distribution has been added the final 2012 RTP.
094-06	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	On page 67, in the section “Components of the Regional Goods Movement System”, we would encourage SCAG to add rail intermodal facilities (ICTF, Hobart, etc.) as a separate bullet point for two reasons. First, they play a significant role in the goods movement system, while also generating traffic and environmental impacts. Second, they are mentioned as a component of the rail improvement strategy (ICTF and SCIG are specifically mentioned).	Comment noted. SCAG has included rail and intermodal facilities.
094-07	Lori Abrishami	Los Angeles County Metropolitan	On page 71, it should clarify in the text that even though the specific alignment has yet to be determined, the east-west freight corridor would generally parallel the UP Los Angeles	Comment noted.

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		Transportation Authority	subdivision/SR-60 between the I-710 and I-605, San Jose Creek/SR-60 between the I-605 and SR-57, and the SR-60 east of the SR-57.	
094-08	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	On page 71, the text states the benefits of an east-west corridor, but SCAG may also want to state why this corridor was selected over the 210, 91, and 10 using information contained in the Comprehensive Goods Movement Study.	Comment noted. Staff will add language on Page 71 to clarify per your comment.
094-09	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	On page 71, SCAG may want to highlight that the east-west freight corridor is envisioned to be a clean freight corridor similar to that which would be built on the I-710.	Comment noted. The introduction of the East-West Freight Corridor is titled "Regional Clean Freight Corridor System" and notes that the EWFC would "provide a platform for the introduction and adoption of zero-emission or near zero-emissions technologies". However, SCAG has included additional language to clarify that the East-West Freight Corridor is expected to be a clean corridor similar to the I-710. The zero-emission concept for the East-West Freight Corridor is more clearly explained in the Goods Movement Appendix including a discussion in the goods movement environmental section regarding near- and long term operational truck technologies that may be considered for a zero-emission or near zero-emission freight corridor.
094-10	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	On page 72, we suggest that the bottleneck relief strategy report should be included in the technical appendix and footnoted in the "Bottleneck Relief Strategy" section. On page 72, SCAG may want to add another paragraph on smaller-scale, near-term goods movement improvements, such as truck climbing lanes on the I-5 and arterial improvements throughout the region.	Comment noted. SCAG includes near term goods movement improvements, such as truck climbing lanes on the I-5 and arterial improvements throughout the region in the 2012 RTP Project List.
094-11	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	On page 74, under Key Rail Projects in the Draft 2012 RTP, we encourage SCAG to highlight the ACE San Gabriel Trench, as it is the largest and most significant ACE grade separation project ($498 million).	Comment noted. These grade separation projects are included in the 2012 RTP Project List. They are further highlighted in the Goods Movement Appendix.
094-12	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	We concur that the Orangeline High-Speed Transit corridor improvement from Union Station to Palmdale is in the Strategic (unfunded) portion of the Draft 2012 RTP/SCS. On page 207 of the main RTP/SCS document, in the last paragraph, that refers to America Fast Forward, please add "and 14 highway projects" in the third sentence after the phrase "to build 12 key mass transit projects".	Comment noted. We have added the strategic projects as requested and have modified this paragraph with language provided by MTA regarding America Fast Forward.

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094-13	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	a) We suggest that SCAG add a definition of the acronym "LOSSAN". b) To clarify which draft CA HSR Business Plan is being referred to, SCAG may want to add the 2012 date. c) SCAG may want to indicate that the CA HSR is estimated to reach our region with the Initial Operating Segment (IOS) in 2021, and the Bay to Basin phase in 2026. Furthermore, it should be clarified in other locations in the document that the IOS will connect to southern California's network in 2021. d) Since the actual speeds for the system will vary by location, SCAG may want to remove the reference to the definition of 110 mph for the CA HSR system. e) On page 51, subsection "Implementation of Phase 1 of the California High-Speed Train (HST) Project", SCAG may want to define which "Authority" is being discussed. f) We request that SCAG clarify that Prop. 1A will allocate $9.95 billion in funding for the project (the current Draft reads almost $1 billion less: "$9 billion"). g) We suggest that SCAG state that the $950 million in funding needs to be allocated by the State. Furthermore, a Memorandum of Understanding is anticipated between the CAHSRA and southern California agencies to identify funds for the region for advance investment in high speed rail corridors and connections. h) On page 52, we suggest that SCAG provide a definition or description of "grade closures". i) We suggest a source of where the LOSSAN strategies are from, to provide clarity. j) Starting at the bottom of page 52, in the section "Improvements to the Existing Metrolink System", we note that positive train control is not a "strategy", it is mandated by Federal law. SCAG may want to add that Metrolink will incorporate this developing technology two to three years ahead of the rest of the nation's passenger railroads. k) The term "speed capacity improvements" needs to be clarified: either it is a "speed improvement" or a "capacity improvement". l) The second paragraph on page 53 suggests that Metorlink will be connected in 2035 when the HST reaches the Central Valley. We suggest rewording the paragraph to be in accordance with Metrolink's operational area and the California High Speed Rail Authority's Business Plan. m) Furthermore, the final sentence in this paragraph implies that it is known what would be needed for travel times of one hour. This is under study regarding the feasibility for Metrolink operations. We ask	Comment noted. Comments noted. A.) LOSSAN is defined on page 51, with a more detailed definition beginning on page 3 of the Passenger Rail Appendix. B.) Edit made. C.) The draft 2012 CA HSR Business Plan indicates the CA HST project will not reach Sylmar until 2034. D.) The definition of 110 mph for high-speed rail refers to the FRA definition of high-speed rail. E.) The Authority is defined in the preceding paragraph. F.) Edit made. G.)Comment noted. The MOU is discussed in the Passenger Rail Appendix. H.) Text changed to "grade separations". I.) The LOSSAN strategies are from the LOSSAN Strategic Implementation Plan effort, as indicated in the text. J.)Comment noted. K.) "Speed capacity improvements" changed to "speed and service improvements". L.) Edit made. M.) Edit made.

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			that SCAG state that there may be significant costs and impacts of such an option.	
094-14	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	It appears that all strategic projects from the Supplement #1 Strategic Plan to the 2009 LRTP were added, but the original strategic projects from the 2009 LRTP were not added.	Comment noted. We have added the strategic projects as requested and have modified this paragraph with language provided by MTA regarding America Fast Forward.
094-15	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	In the Transportation Safety Appendix, we suggest using the term "people [or persons] with disabilities" for describing members of the public for whom the Americans with Disabilities Act applies.	Comment noted. Recommendation incorporated into the Transportation Safety Appendix.
094-16	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	The SCS Background Technical Appendix should include the methodology for calculating GHG emission reductions associated with the RTP/SCS alternatives, including assumptions and discussion of off-modeling analysis. The SCS Background Technical Appendix should provide some discussion of the relative benefit of various transportation and land use strategies toward reducing regonal greenhouse gas emissions. For example, how much of the reduction is attributable to the VMT fee, TDM measures, TSM measures, etc. Moving forward, this information would be useful for cities and other agencies seeking to reduce GHGs in local Climate Action Plans and transportation planning efforts.	Comment noted. Additional information regarding the calculation of GHG emission reductions has been included in the Final RTP. SCAG is evaluating the relative benefits of various strategies and will make this information available upon completion.
094-17	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	In the Aviation and Ground Access Technical Appendix: on page 126, Table 4-8, under the Exposition Light Rail Phase II, the description currently reads that it will "connect" to the Exposition Light Rail Phase I, and it should be corrected to say that it will "extend the Exposition Light Rail Phase I"; and, the same Table 4-8 should include the Slauson Light Rail: Crenshaw Corridor to Metro Blue Line Slauson Station (RTP# 1120003) because it provides additional access to LAX.	Comment noted. The Airport Ground Access Report in the Aviation Technical Appendices of the Draft 2012 RTP/SCS has been updated to include this new information on the Exposition Light Rail Line and the Slauson Light Rail: Crenshaw Corridor to Metro Blue Line Station.
094-18	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	On pages 7, 95 and 100, we request that SCAG replace the word "tunnel" with "transportation improvement options".	We have updated the language to read “SR-710 Transportation Improvement Options".
094-19	Lori Abrishami	Los Angeles County	Project List Appendix: On page 27, delete description for the 13th entry and replace with, "Route 710: Study to evaluate	Comment noted. The Project List entry for the 710 environmental studies is the project description in the adopted

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		Metropolitan Transportation Authority	transportation improvement options and prepare alternatives analyses, engineering and environmental studies" (EA#187901 and PPNO#2215). On page 162, delete the description for the fifth entry and replace it with, "Route 710: Study to evaluate transportation improvement options and prepare alternatives analysis, engineering and environmental studies" (EA#187901 and PPNO#2215). On page 163, in the first entry, delete the description and replace it with, "Develop transportation improvement options". On page 430, the fifth entry, delete the alternatives to the SR-710 tunnel option and replace it with, "SR-710 transportation improvement options". On page 432, the sixth entry, delete the description and replace it with, "SR-710 transportation improvement options". Highways and Arterials Appendix: On page 3, the first entry under Toll Lanes heading, delete the description and replace it with "Develop transportation improvement options".	Federal Transportation Improvement Program (FTIP) and FTIP description changes must be requested through the standard FTIP database update process. Regarding SR-710, references to the “SR-710 Gap Closure” have been revised to “SR-710 Transportation Improvement Options”.
094-20	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	Passenger Rail Appendix: a) Page 1, reference is made to Amtrak service. It should be stated that all Amtrak service other than the Pacific Surfliner are intercity and long distance routes that connect LA County and adjoining counties with destinations throughout California and the US. Also, the Antelope Valley Line is part of the LOSSAN Corridor between Burbank Junction and LA Union Station. b) The Passenger Rail document should eliminate reference to Maglev and the SCAG HSRT as this creates confusion and appears to indicate that the technology and proposed corridor are still under consideration. As written, it appears as if the Maglev technology and the CA High Speed Rail program are in competition with each other. It is unclear why this is heavily covered in this document when the conclusion is that the project is no longer planned. c) The vision for rail service in the So. Cal. region should provide a stronger emphasis on intermodal linkages at the three regional airports that will be physically or temporally linked to the CA High Speed Rail. These airports include Palmdale, Bob Hope and Ontario. Each of these airports already has passenger rail accessibility, but this will be strengthened as a result of current planning and system development efforts. d) The document should amplify on the role of regional rail integration and service/operating improvements in meeting regional greenhouse gas reduction and vehicle miles traveled/vehicle trip reduction goals. Further,	Comment noted. Comments noted. A.) Edits made to incorporate this comment. B.)Comment noted. The section on the SCAG HSRT Maglev project is included to give a background of SCAG’s high-speed rail planning efforts in previous RTPs, and to show it is no longer considered financially viable. The High-Speed Rail Subcommittee voted to not include it in the 2012 RTP/SCS, as reflected later in the Passenger Rail Appendix. C.) Discussions of intermodal linkages with CA HST are discussed in the appendix, but also in Chapters 2 and 7 of the RTP. D.)Comment noted. E.)Comment noted. Much of this discussion is included in “The Strategic Plan: Our Ultimate Vision for High Speed Rail” section beginning on page 18. F.)Comment noted. G.)Comment noted. This comment is discussed in “Cooperative Agreements” beginning on page 16. H.)Comment noted. The Antelope Valley Line Study is discussed in Chapter 2 on page 52. The other projects are included in the RTP and identified in the project list. I.)Comment noted. J.) The CHSRA’s decision to drop the Grapevine alignment again in 2012 is discussed in Chapter 2. K.)Comment noted. The Authority is defined earlier in the appendix.

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			the document should identify the passenger rail station areas as candidate locations for land use intensification that address the regional jobs/housing imbalances. e) The discussion of the statewide HST system and what it means for So. Cal. is fragmented. There should be a clearer definition of the technology, routes, and what it means for regional connectivity. f) The document should make clearer the desired effect of the Early Infrastructure Investment initiative both to develop the way for HSR and to incrementally upgrade existing infrastructure to support higher speed, more efficient and safer passenger rail service linking the region to the HSR system. This could include reference to the use of shared corridors and shared corridor/shared track scenarios that will help improve existing passenger service and enhance service integration across the region. (continued)	
094-21	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	(continued) g) The discussion of the Pacific Surfliner should refer to the recent efforts to develop the business plan for the corridor and the addressing of short term improvements, also include the efforts to create synergy in the corridor and to move towards local governance. The discussion should include the advantages of this. h) The discussion of Metrolink should include capital studies in LA County that are underway. Specifically: Antelope Valley Line Study - this is a comprehensive study of the Antelope Valley Line for capital improvements and enhancements to overall safety. The study will address capacity and travel time issues, grade crossing upgrades and grade separations. The proposed improvements will be modeled and from that a prioritization and funding strategy will be developed for implementation of the improvements. CP Raymer to CP Bernson Double Track - this is Preliminary Engineering and Environmental work (PE/NEPA) to double track this segment of the Ventura Line. This project will complete the double tracking of the LOSSAN Corridor from Chatsworth to Orange County. Metro received an ARRA grant for this work and is partnering with Metrolink to complete it. Metro is pursuing funding for construction. Van Nuys Station - this station on the LOSSAN Corridor is used by Amtrak and Metrolink. It is a single platform station that is an operational bottleneck in the system. Metro received an ARRA grant to perform PE/NEPA work for a second platform at this station. Strategic Studies - Metro is moving	Comment noted. The Final RTP will be edited to incorporate these comments.

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			forward with strategic studies of other Metrolink lines in LA County. Metro will be working with the other member agencies on shared lines to develop overall strategic priorities. i) On page 15, regarding the discussion of decision points after construction of the Initial Construction Segment, there will not be a decision to continue the project. That will be an ongoing discussion prior to that. Prior to the completion of that segment there will be discussion regarding proceeding north or south. The document should not discuss decision points for the system. This will be an ongoing process for CHSRA and will be based on business models and funding opportunities. Also, on this page the various stages should use the term "extend" rather than "build". (continued)	
094-22	Lori Abrishami	Los Angeles County Metropolitan Transportation Authority	(continued) j) Note that the CHSRA has decided to move forward with a Palmdale station and not move forward with the I-5/Grapevine alternative. This should be mentioned and the discussion should include what this means for the Palmdale area. k) Page 17 refers to the "Authority's draft 2011 Business Plan". This may be the California High Speed Rail Authority but it is noted within the Metrolink discussion and can confuse the reader. We suggest stating the specific Authority involved.	Comment noted.
095-01	Avital Shavit	Los Angeles County Metropolitan Transportation Authority	Metro would like to request modifications to the TCM Timely Implementation Report that we have submitted to SCAG staff via e-mail on 2/14/2012	Comment noted. Appropriate revisions will be reflected in the Final 2012 RTP TCM Timely Implementation Report.
096-01	Herman Cheng	Los Angeles County Metropolitan Transportation Authority	LACMTA is commenting on the "Project List" appendix. We would like to request modifications to the project list that we have submitted to SCAG staff through the standard FTIP database update process. Major project modifications include: · LAF1197 · LA0G451 · LAF3114 · LA0G406 · LAF1136 · LA0D441 · LA0D442 · LA0D465 · LA0F010 · LA0C8086 · LA0D145 · LA0D145B · LA0D747 · LA996347 · LA0D399 · LA0D450 · LA0D480 · LAF3434 · LAF1455 · LA990305 Major project additions include: · LA0G774 · LAF5309 · LAF5306 · LAF5302 · LA0G814 · LAF5307 · LAF5101 · LAF5100 · LAF5300 · LAF5115 · LAF5310 · LAF5314 · LAF5315 · LAF5316 · LA996345 · LAF5305 · LAF5301 · LAF5129 · LA0G726 · LA0G754 · LA0G755 · LAF5303 · LAF1343 · LA0G830 · LA0G598	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the 2011 FTIP A24 update process.
097-01	Diego Alvarez	Los Angeles	Use of Airport Funds: LAWA's first priority is to maintain safe	Comment noted. SCAG recognizes that the federal government

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		World Airports	and efficient airports. Our revenues and expenditures are used to support that effort and fulfill our commitment to supporting the national airspace system. All airports have a tremendous demand for capital improvements. As such, most airports depend on financial support from the FAA via grant funds for eligible construction and noise mitigation projects. In return for federal grant monies, the FAA includes grant assurances that limit use of airport revenue solely for aviation-related uses on airport property. Using airport funds for non-airport functions violates federal law and jeopardizes the airport's ability to receive federal grants. Nevertheless, LAWA seeks to partner with SCAG to find solutions to support ground access improvements to airports, other primary transportation facilities, and "secondary" airports in the region.	currently places strict limitations on the use of airport revenues for off-airport purposes. To address this issue, SCAG has adopted regional aviation policies in support of new legislation that allows for more flexible use of airport revenues for off-airport ground access projects when requested by airport operators, and this policy continues to be advanced in the Draft 2012 RTP/SCS. SCAG welcomes continued partnership and coordination with LAWA in developing and implementing regional airport ground access strategies.
097-02	Diego Alvarez	Los Angeles World Airports	Use of Airport Express Buses: The RTP includes an "Action Step" which would plan and promote a regional system of airport express buses, modeled in part on the Fly Away service currently operating at LAX. LAWA agrees that express buses are a promising solution to certain ground access problems. However, it has been LAWA's experience that express buses are most effective at airports with high passenger demand and in cities with concentrated populations of passengers and employees. Even then, high fares or significant subsidies have been required to maintain an effective level of service. LAWA has spent a great deal of resources carefully studying the feasibility of establishing new FlyAway routes to serve LAX. However, even for LAX, with its extensive market area and passenger base, it has been a challenge to find station locations that are both viable and successful. LAWA invites SCAG to continue examining ways to bring similar projects to other airports, but cautions that these services, by themselves, may not be effective in increasing passenger demand at "secondary" airports.	Comment noted. We agree that express buses are most effective at airports with high passenger demand, as discussed in the Airport Ground Access Report in the Draft 2012 RTP/SCS Aviation Technical Appendices, and that new “FlyAways” serving airports other than LAX are not likely to have a significant impact on future regional air passenger distributions. SCAG looks forward to working with LAWA in identifying sites for viable new “FlyAways,” and re-examining aviation activity constraints at LAWA-operated airports for SCAG’s next (2016) Regional Transportation Plan.
097-03	Diego Alvarez	Los Angeles World Airports	Aviation Activity Constraints: LAWA agrees that the aviation activity constraints in the region, and potentially dispersion of that activity at other airports, should be re-examined in subsequent regional plans.	Comment noted. SCAG looks forward to working with LAWA in re-examining aviation activity constraints at LAWA-operated airports for SCAG’s next (2016) Regional Transportation Plan.
097-04	Diego Alvarez	Los Angeles World Airports	Additional Technical Clarifications: LAWA also wants to offer the following technical clarifications to the RTP: SCAG has reported a number of vehicle trips to LAX under existing conditions as	Comment noted. The vehicle trip estimates from the LAX Master Plan EIR/EIS were not used directly in the Draft 2012 RTP/SCS Airport Ground Access Report since they were

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			well as under a future forecast for 2035, citing the LAX Master Plan EIR/EIS as a justification for those trip numbers. However, the numbers reported do not correspond to data that LAWA has previously reported or used in any environmental analysis. LAWA requests clarification of those data points. LAWA recommends the following changes to Table 4-6 and 4-7 in the Aviation and Airport Ground Access sections of the RTP. In Table 4-6, the following projects should be included in the list of projects completed since the project notice of preparation in 2008 (footnote 1): Douglas St., La Cienega Blvd., Lincoln Blvd. (all), Nash St., Sepulveda Blvd. (both), the I-105 westbound off ramp at Sepulveda Blvd., and the I-405 at SR-90. Two other projects on Table 4-6, Arbor Vitae St., and the I-405 from I-10 to SR-101, are under construction as of January 2012. In Table 4-7, Project LAX-19, which includes Lincoln Blvd. Improvements, has already been completed. LAWA recommends that SCAG include in the RTP a portion of the project referred to as LAX-10, widening Aviation Blvd. from Century Blvd. to Manhattan Beach Blvd. to 3 lanes in each direction.	prepared for different years (2005 and 2015) than those used in the report, and were generally expressed in terms of peak hour traffic volumes rather than daily traffic volumes. The vehicle trips shown in the Airport Ground Access Report were estimated using data and factors that were derived from a variety of sources, including the LAX Master Plan EIR/EIS, the 2006 LAX air passenger survey, and reports issues by the Aviation Cooperative Research Program and Transit Cooperative Research Program. In general, traffic data from the LAX master plan was used to approximate a trip generation rate for the airport that was applied to the forecast passenger increase to project future traffic volumes. Table 3-3 in the Airport Ground Access Report will be clarified to reflect these distinctions. Comment noted. The Airport Ground Access Report in the Aviation Technical Appendices of the Draft 2012 RTP/SCS have been revised to incorporate the recommended changes to LAX ground access projects listed in Table 4-6 and Table 4-7.
097-05	Diego Alvarez	Los Angeles World Airports	2011 Air Passenger Survey: Lastly, the 2006 LAX Air Passenger Survey was used to create several data points within this section of the RTP. LAWA is hoping to unveil the results of its 2011 Air Passenger Survey in February of this year. SCAG should consider updating its Appendix with this new data as it finalizes the RTP. LAWA will post the results of this survey on our website once the report is completed.	Comment noted. Due to time and resource constraints SCAG is unable to incorporate data from LAWA's recently released 2011 LAX Air Passenger Survey into the Airport Ground Access Report in the Aviation Technical Appendices of the Draft 2012 RTP/SCS. However, this new data will be used in any future updates to this report.
098-01	Dan Fairbanks	March Joint Powers Authority	Exhibit 4.18, Land Use Pattern Riverside County (2035) identifies a "High Quality Transit Opportunity Area" located along Alessandro Blvd in proximity to I-215, within the City of Riverside, City of Moreno Valley, unincorporated Riverside County and March Joint Powers Authority. The concentration of high density residential and/or high density commercial uses along portions of the Alessandro corridor would conflict with the airport Accident Potential Zones as defined in the 2005 March Air Reserve Base Air Installation Compatibility Use Zone (AICUZ) study, and further conflict with the recommended airport compatibility provisions identified in the draft Joint Land Use study currently undergoing environmental review by the Riverside County Airport Land Use Commission. While transit is encouraged by these plans, the proposed increase in	Comment noted. We agree that any proposed changes in land use densities that lie within airport Accident Potential Zones and/or conflict with airport land use compatibility provisions and standards should be analyzed and reviewed by the impacted airports and appropriate Airport Land Use Commissions.

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			densities/intensities in this area of high noise and airport safety concerns necessitates detailed analysis, best performed by the Riverside County Airport Land Use Commission and March Air Reserve Base.	
099-01	Marnie Primmer	Mobility 21	Mobility 21, Southern California's transportation advocacy coalition, respectfully submits these comments as part of the ongoing efforts of Southern California Association of Governments (SCAG) to produce a comprehensive 2012 Regional Transportation Plan (RTP). Mobility 21, being comprised of both business and government entities is uniquely positioned to provide insight into the RTP process. We recognize SCAG staff's diligence in crafting an RTP that will meet the requirements of the federal process and of the newly-required SB375 legislation. Mobility 21 also appreciates the open process and intensive outreach SCAG has undertaken during the development of the 2012 RTP. Nevertheless, we share these ideas regarding the RTP as currently laid out and thoughts on reforming the RTP process for future success. First and foremost, our goal is to assist SCAG with ensuring the final adopted RTP is both comprehensive and defensible, provides flexibility to the county transportation agencies responsible for delivering projects under the program, and supports a strong private sector economic engine. We have five recommendations to provide to SCAG at this time:	Comment noted. See responses associated with the specific comments.
099-02	Marnie Primmer	Mobility 21	Protect Locally-Approved Sales Tax Measures: The program of projects submitted to SCAG by the county transportation commissions consist in part of projects promised to voters as part of locally-approved sales tax measures. Mobility 21 reminds SCAG that these projects individually and together constitute a contract with the taxpayers that must be respected and implemented as voters approved. Local taxpayers have prioritized the distribution of funds in their respective sales tax measures to a complete, multi-modal program of projects to meet local needs. Changes cannot and should not be made without taxpayer approval. The RTP should strengthen and enhance the ability of the counties to deliver these projects, while at the same time supporting their efforts to deliver non-sales tax projects that will provide greater mobility, congestion relief, and air quality benefits. The RTP needs to bolster the efforts of local transportation agencies, and the business	Comment noted. The RTP includes the local option sales tax measures and their associated projects as submitted by the county transportation commissions.

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			community that supports them, to protect this essential covenant with voters and taxpayers. Failure to do so will make approval of future funding measures nearly impossible.	
099-03	Marnie Primmer	Mobility 21	Thorough Economic Analysis: As yet, the impact of the elimination of redevelopment agencies is unknown in terms of the delivery of transportation projects. Some business groups have also expressed concern over the feasibility of several of the proposed financial options and mitigations included in the RTP. Mobility 21 strongly urges SCAG to incorporate a thorough economic analysis into the development and approval of the RTP so that all elements of the final approved plan support the economic growth of this region.	Comment noted. Economic and Job Creation Analysis has been updated to provide a more comprehensive assessment of the benefits and impacts of the 2012-2035 RTP.
099-04	Marnie Primmer	Mobility 21	Locally Sensitive Context: This RTP is the first of its kind. SCAG has done a yeoman's job of working to produce Sustainable Community Strategies, housing analysis and transportation projections in the RTP. However, Mobility 21 remains concerned that intensifying development in the urban core may impact future housing availability, choices and affordability. Recommendations regarding land-use should take into account the region's disparate communities, geographies, market forces, and take a flexible approach to protect the diversity of the region.	Comment noted. The land use component was developed through more than two years of collaboration with local governments, demographers, economists and other stakeholders. A robust environmental justice analysis has been completed and is included in the Environmental Justice Appendix. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. Trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor this information in the future as the economy is recovering. SCAG will include mitigation strategies for gentrification. We look forward to continuing to work with environmental justice and public health stakeholders on strategies to prevent displacement. Moreover, population and household figures by income group for the RHNA planning period are provided to each local jurisdiction such that the required housing by type, income category, and affordability can be addressed through local housing element updates - which will be due 18 months after the adoption of final RTP (around October 2013).
099-05	Marnie Primmer	Mobility 21	Protect Region's Economic Competitiveness: A large share of our regional economy is dependent upon the flow of goods from our ports, through the counties and to the rest of our nation. Infrastructure improvements related to goods movement are vital for Southern California to remain economically competitive. As other options become available	Comment noted. Strategies identified in the 2012 RTP are intended to ensure the continued economic contributions of regional goods movement activities while addressing associated air quality, environmental, and community concerns. SCAG has worked very closely with regional stakeholders to identify potential solutions to achieve these goals. SCAG believes that

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			both nationally and globally for cargo movement, Mobility 21 is concerned that components of the RTP could put the region at a disadvantage, such as implementing new technologies before they are feasible or imposing fees on businesses operating in the SCAG region. New revenue sources should be developed and implemented at the federal level, not the local and regional level.	the strategies articulated in the 2012 RTP actually provide the region appropriate and feasible options to maintain and improve its current advantages related to freight movement in a responsible manner. The RTP does not assume the implementation of local, regional, or statewide freight fees. Ensuring that the SCAG region or its member entities are not at an economic disadvantage were critical considerations used in the development of all funding proposals included in the RTP. Further, considerable analyses have been undertaken by SCAG over the course of the last several years to better understand global logistics supply chain and the potential for cargo diversion. We have learned that numerous factors including the imposition of fees as well as factors beyond our region's control could impact cargo growth and our regional business climate. SCAG's proposed freight and financing strategies identified in the 2012 RTP carefully take into consideration these factors.
099-06	Marnie Primmer	Mobility 21	Reform the Process: Mobility 21 recognizes that federal and state transportation planning processes are imperfect and that SCAG must work within the proscriptive requirements of existing laws and regulations. We therefore propose to identify systemic weaknesses in the process and work to reform the flaws in the RTP process that consume substantial resources, but add little or no value. Our intent is to help reduce the time and cost expended on the process and to remove regulatory hurdles that inhibit the development and delivery of effective, efficient, and timely transportation projects and services. Specifically, Mobility 21 encourages changes in state legislation that would enable MPO's to use low and no-cost alternatives to reach out to the public in lieu of resource-heavy public meetings. Additionally, since 83% of the funding for projects in the RTP comes from non-federal sources, Mobility 21 believes that empowering the federal government to veto a locally approved financially constrained RTP unnecessarily jeopardizes federal funding needed to complete projects. Mobility 21 therefore will seek modifications to federal legislation that would enable MPO's with over 75% local funding to self-certify that an RTP is financially constrained. Again, Mobility 21 applauds SCAG for the open and transparent process used to develop the 2012 RTP. We look forward to working with SCAG staff in the final stages of RTP implementation to ensure the	Comment noted.

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			strongest possible document is delivered to the Regional Council in April.	
100-01	Beth Steckler	Move LA	We congratulate the leadership and staff of the Southern California Association of Governments and its Regional Council members on the agency's first-ever Sustainable Communities Strategy and Regional Transportation Plan that meets the 2020 and exceeds the 2035 greenhouse gas reduction targets, achieves Clean Air Act conformity, and reduces vehicle miles traveled and traffic congestion— despite projected population growth of about four million residents by 2035. We applaud SCAG staff for their leadership and for their collaboration with local governments, county transportation commissions and a wide range of non-governmental organizations. This effort was particularly challenging given it is the first time anyone in the region has put together an SCS. In the spirit of creating a stronger RTP/SCS this year and in future years we offer these recommendations.	Comment noted.
100-02	Beth Steckler	Move LA	1. Ensure adequate funding to carry out the RTP/SCS. We applaud SCAG's goal of bringing all roads to a "state of good repair," and understand the policy decision to look for new revenue sources rather than to eliminate transportation projects in order to address the RTP's projected $200 billion shortfall. We understand that it may be more politically palatable for the Regional Council at this time to project reliance upon expanded federal sources, such as indexed gas tax or a transition to an equivalent VMT fee, but that does not make it more achievable.	Comment noted.
100-03	Beth Steckler	Move LA	a. Emphasis should be on more achievable revenue sources such as local voter approved fees or taxes rather than more speculative federal sources The recent history of voter response to county-based transportation funding measures in the SCAG region suggests a more promising local direction. The experience with Measure R in LA County and the recent extension of sales tax measures in other SCAG counties demonstrates to us that regional voters are not as tax-averse as some believe, especially when voting on measures to fund well defined local transportation investment, if they have confidence in the agencies and are clear about investment priorities. Voters in Los Angeles County approved sales tax measures by 54% in 1980, 50.4% in 1990, and 67.8% in	Comment noted.The projected revenue from the mileage-based user fee beginning in 2025 and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. We also recognize that the future cannot be known with absolute certainty and we

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			2008. This suggests an increased willingness, not reluctance, to support transportation investments by LA County voters. In San Bernardino, Riverside and Orange sales tax extensions were easily approved: Riverside voters approved Measure A in 2002 with 69% of the vote; San Bernardino County approved Measure I in 2004 with 80% of the vote; and Orange County approved a sales tax extension in 2006 with almost 70% of the vote. In each case the original sales taxes had been originally approved with narrow majorities. The point is that, with the exception of Ventura County, voters throughout the SCAG region have consistently voted to approve new or extended sales tax measures for transportation improvements by substantial and increasing majorities in excess of 2/3. If a county or the region needs more funds for transportation investments, local voters seem a more promising opportunity of first resort than a contentious State Legislature or the Congress. We urge SCAG to work to challenge its member transportation commissions to go to voters in the near future for local and regional funding solutions instead of "punting" this problem of a regional funding shortfall to the federal government. In other words, let's make the funding of regional planning more achievable, and thus more real.	therefore made reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and documented in the Draft RTP to ensure transparency. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
100-04	Beth Steckler	Move LA	b. Recommendation: Develop regional revenue sources to fund regional projects. There are a number of transportation systems that are vital to the welfare of the Southern California region as a whole, rather than specific counties. This includes the 450-plus-mile regional commuter rail system operated by Metrolink and the regional goods movement system. Region-wide investments in each of these systems could yield enormous economic, environmental, and equity benefits. We urge SCAG and its Regional Council to consider taking a truly regional approach to an investment strategy for each of these regional systems by including in the RTP projected additional revenue from a region wide revenue source. We recommend a broad-based uniform regional tax or fee increase, such as a 1/8 – 1/4 cent increase in sales tax or equivalent parcel tax, that can raise between $15- $30 billion over the 25 year life of the plan to invest specifically in regional	Comment noted.

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			transportation needs such as meeting the needs of our goods movement infrastructure, modernizing and electrifying the regional commuter rail system, providing expanded BRT and bus service as well as first-mile-last-mile bike-pedestrian infrastructure that would connect to that regional commuter system. We would pledge to work with you to build support for such a funding measure.	
100-05	Beth Steckler	Move LA	c. Recommendation: Develop strategies to provide adequate funding to modernize freight transportation projects. The goods movement industry is a vital component to the Southern California economy but is also a major reason for our poor air quality and various health impacts affecting the region. Developing and investing in both the zero and near-zero emission goods movement technology and the operational efficacy of the goods movement infrastructure would significantly benefit the region and the many communities of concern that are directly affected by emissions and congestion from transportation and rail activity. Estimates of the regional investment needed could be up to $25 billion over the life of the plan. Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies as well as the infrastructure needed for operational efficacy should be a central component of the regional strategy. For these reasons, we recommend that SCAG include the following strategies: Develop a clear assessment of funding options available, including various models of public-private partnerships that could make zero-emission and near-zero emission freight technology options possible and ensure an efficient goods movement system in the region. Recommend pursuing legislation seeking a $30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as $441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports and more in subsequent years as cargo activity grows at our ports. Such a program could generate over $10 billion over the life of the plan.1 Previous legislative efforts have created a broad coalition to support this	Comment noted.

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			measure. Such legislation has been approved twice by both houses of the state legislature only to be vetoed by the previous governor. As previously stated, we recommend a broad-based uniform regional tax or fee increase, such as a 1/8 – 1/4 cent increase in sales tax or equivalent parcel tax that could raise between $15- $30 billion over the 25 year life of the plan to invest specifically in regional transportation needs such as goods movement infrastructure needs, as well as modernizing and electrifying the regional commuter rail system and related infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region. Include public health as an overarching priority and goal in the $2.1 billion annual freight program included in the Environment and Public Works Committee.	
100-06	Beth Steckler	Move LA	d. Support national efforts to create a strategic plan for the freight system. Encourage SCAG to include language that clarifies the current federal funding restraints and alter the RTP to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100. As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding. The establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Chambers. Actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program. Support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written.	Comment noted. SCAG, in coordination with our regional partners, continues to actively support the passage of a national freight program. We also recognize that the future cannot be known with certainty and we therefore made reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and documented in the Draft RTP to ensure transparency. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent updates as appropriate. At a minimum, a new or updated RTP is adopted every four years.
100-07	Beth Steckler	Move LA	Champion increased Compass Blueprint funding to help local governments update their general plans to implement the SCS. While the RTP/SCS shows a significant shift in household growth toward HQTAs, this will in most cases require changes in General Plans and community plans — and ensuring that this will happen is likely to require incentives and other resources.	Comment noted. Through the Compass Blueprint Program, SCAG has worked and provided direct technical assistance to 94 separate jurisdictions including local cities, counties, non-profits, and transportation agencies. Future calls for applications will focus on local implementation of SCS strategies, and will prioritize projects located in High Quality

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			SCAG's Compass Blueprint program was successful in helping many communities move in the direction of smart growth and urban infill years before SB 375. With additional funding, the Compass Blueprint Demonstration Project Program could fund the SCS implementation and ensure that growth happens in an equitable way with minimal displacement, in addition to updating plans. SCAG should also work with the other MPOs to advocate for a statewide "infill first" package of incentives to promote development near transit. SCAG should also consider working with the CTCs to find sources of funding for land use planning in HQTAs.	Transit Areas (HQTA). In addition, other local and regional funding agencies have begun to incorporate Compass Blueprint principles into their discretionary funding programs. SCAG will continue to pursue dedicated and discretionary funding for this worthy voluntary program.
100-08	Beth Steckler	Move LA	Expand proposed funding for transit, Metrolink, bus rapid transit, bicycling, and pedestrian travel into the RTP constrained plan. We need increased investment for bus and rail transit, bicycle and pedestrian systems. This is especially true in the Inland Empire where over-dependence on a spreading highway infrastructure and dispersed land use pattern has made residents in these counties very vulnerable to just the kind of economic calamity witnessed in the 2008 – 2012 Great Recession. In addition, residents of agricultural areas, especially in the eastern Coachella Valley, the North Shore of the Salton Sea and similar communities, remain disproportionately underserved by transit, which makes it very difficult for residents without a car to access health care, groceries, or good jobs. Improvements to bus headways, especially in these areas, could create new HQTAs. Building transit infrastructure is one of the best ways to create good, "green" jobs that enhance the health and wealth of the region and its residents. Construction work can provide a career path to middle-income jobs through apprenticeship programs that provide young workers with formal training. Agencies that adopt project labor agreements and requirements ensuring that jobs will go to local workers — and/or those who live in areas with high unemployment — help make the local economy more robust because workers' earnings will be spent at local businesses, creating additional jobs and local tax revenues.	Comment noted. Project #7120009, #7120008, and #7120007 represent $3.0 billion in additional rapid, express, and local bus service over the life of the plan. The figures for bus service availability referred to in the comment are base year data, and do not reflect the 2035 plan.
100-09	Beth Steckler	Move LA	Move enhanced Metrolink investments into the Constrained Plan.	Comment noted. Commuter and passenger rail capital investments total $51.8 billion in the 2012 RTP/SCS, and transit

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			The Metrolink commuter rail system is a regional gem that could become a major source of VMT reduction, congestion relief and economic development. It links many communities in every county in the region. We recommend moving into the Final Plan (the Constrained Plan) the upgrading of the Metrolink commuter rail system region-wide to make a planned transition to an all-electric system capable of providing zero-emission high-speed service (up to 110 mph) and enabling expanded express service in select corridors with double tracking, grade separations and other modifications needed. Such an upgrade may cost the region as much as $8 to $10 billion, but would be well worth the investment in terms of congestion relief, emission reductions and economic opportunity created. This RTP Constrained Plan enhancement could be funded by new resources, such as the regional sales tax proposed above. Specifically, we want to highlight opportunities for enhanced investments on several key lines that we believe will create exceptional regional connectivity. The Antelope Valley Line, which is the focus of current planning efforts to dramatically reduce the time it takes to travel over 76 miles from Lancaster to Union Station by more than fifty percent - from nearly two-hours to about one-hour. The San Bernardino Line's success with limited express service from downtown San Bernardino to Union Station indicate express service on a regular basis is possible, especially if a direct link into Ontario Airport is created. The Ventura County Line and the Orange County Line present the possibility of a continuous, high speed, electric express system from Ventura to Union Station to Orange County to San Diego. LA Union Station Run-Through Tracks project would significantly enhance regional trip potential of all Metrolink corridors serving Union Station by improving efficiency and throughput capacity. We recommend additional corridor infrastructure enhancements and improvements in Appendix A. Each of these Metrolink corridors and projects, if funded and enhanced, will create opportunities for new BRT and enhanced bus service, as well as smart growth infill with first-mile-last-mile bicycle and pedestrian infrastructure in multiple communities and will create enhanced access to the jobs corridors throughout the region.	investments total $55.0 billion, even though in current year figures commuter and passenger rail total roughly 2% of all transit ridership. The commuter and passenger rail strategies laid out in the 2012 RTP/SCS represent aggressive capital development strategies in the LOSSAN and Antelope Valley corridors, that will be refined as the LOSSAN Strategic Improvement Plan and the Antelope Valley Infrastructure Improvement Strategic Plan study processes evolve. Project #7001210 includes early action capacity, safety, and speed improvements along these corridors. Some of the improvements outlined in this comment, including the LA Union Station Run Through Tracks, may be included as the Memorandum of Understanding for early action project funding process evolves. The electrification of shared use rail facilities will be a discussion that occurs over the life of the 2012 RTP/SCS. These discussions will need to occur between passenger carriers, freight carriers, and the California High Speed Rail Authority. The 2012 RTP/SCS is not intended to prefigure these discussions, nor to preclude a local planning and analysis process as to how all three types of carriers might operate in shared use corridors.

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100-10	Beth Steckler	Move LA	Expand Bus Rapid Transit and provide more frequent bus service on high-performing routes linked to Metrolink to give more people alternatives to driving alone. Well over 80 percent of transit ridership in the region now uses bus service. While our rail transit system is expanding dramatically, we should expect that heavy reliance on bus service is likely to continue as far out as 2035. However, while there is a lot of growth projected for the Inland Empire, much of it will not be near existing or planned bus or rail service. For example, in Riverside County, about 40% of residents live near bus lines with some service (15-30 minute headways) but presently only 10 percent of the population is served by high-quality transit (with 15-minute headways). By expanding the Bus Rapid Transit (BRT) system in the Inland Empire, especially where proposed lines would connect with the potentially enhanced Metrolink lines and by bringing up service on select higher performing lines to 15- minute headways we could increase high-quality transit at a much lower cost. Our recommendations in Appendix A are limited to improvements to investment in Bus Rapid Transit infrastructure (BRT) and enhanced bus service with connections to the Metrolink Regional Rail network or regional airports. Each of these Metrolink corridors and projects, if enhanced, will create opportunities for new smart growth infill and TOD investment in multiple communities. These corridors could be served as well as by first-mile-last-mile bicycle and pedestrian infrastructure opportunities, and will help create enhanced access to jobs throughout the region. See Appendix A below.	Comment noted. Project #7120009, #7120008, and #7120007 represent $3.0 billion in additional rapid, express, and local bus service over the life of the plan. The figures for bus service availability referred to in the comment are base year data, and do not reflect the 2035 plan.
100-11	Beth Steckler	Move LA	c. Increase funding for active transportation to at least $12 billion for bicycling and pedestrian improvements. SCAG has received an outpouring of support for increased investment in bicycle and pedestrian infrastructure and projects at workshops and hearings across the region, as well from members of SCAG's Regional Council. As was often repeated at the hearings, according to the 2009 National Household Travel Survey of California, 14 percent of all trips in the region are pedestrian while 6 percent are on bikes, and 25 percent of all roadway injuries and fatalities affect pedestrians and bicyclists, yet only 1 percent of the regional investment is identified as going to non-	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the

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			motorized modes. A poll of Southern California voters sponsored by Move LA, NRDC and the American Lung Association late last year found that voters would make bicycle and pedestrian investments a much higher priority. While we applaud the SCAG staff for recommending that funding for active transportation be increased from $1.8 billion to $6 billion, we believe funding should be at least $12 billion. We believe investments should prioritize first-mile/last-mile connections to transit stations, which will help support the increased investment in the transit system. Investments should also be prioritized for areas of disproportionate high injury and fatality rates and in areas with lower car ownership rates. Safe Routes to School strategies and investments to improve the safety of students as they walk and bike to school should also be promoted because statewide cuts in school transportation budgets make getting to and from school more difficult for K-12 kids — especially in rural areas where there are no sidewalks or safe bike routes. We recommend SCAG work with the CTCs to identify funding sources that are flexible and that could be used to prioritize accelerated transit, bike, pedestrian and other traffic-reducing projects. It is our judgment that one appropriate source of funding for this program could be the regional sales (or parcel) tax we have suggested earlier.	plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
100-12	Beth Steckler	Move LA	d. Encourage CTCs and local jurisdictions to adopt "complete streets" policies. We believe that SCAG should encourage CTCs and local jurisdictions each to adopt a complete streets policy so that bike and pedestrian improvements can be made routinely and more economically when streets are improved or built. For example, counties in the SCAG region, especially outside of LA County, often include funding for arterial capacity enhancements for streets which largely run between and through community centers. These stretches of boulevards seem very good opportunities for implementation of "Complete Streets" programs. We recommend that SCAG identify such opportunities and call them out for special programming efforts.	Comment noted. SCAG is committed to working with local jurisdictions in the development, implementation, and maintenance of local active transportation plans, which includes the adoption of Complete Streets policies.
100-13	Beth Steckler	Move LA	e. Work with CTCs to develop a methodology for quantifying the unmet need for bicycle and pedestrian investments to improve safety and increase active transportation. SCAG should work	Comment noted. SCAG is committed to working with local jurisdictions in the development, implementation, and maintenance of local active transportation plans. SCAG will

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			with the CTCs to develop a methodology for quantifying the unmet needs, particularly safety needs, for cyclists and walkers. Because concerns about safety may discourage people from walking and biking entirely, surveys may be required, especially in rural areas, to accurately assess the needs of residents. We recommend that SCAG work with the CTCs to develop active transportation budgets and to identify existing and potential local and regional funding sources. One idea, for example, would be to create guidance that would be used to allocate funding in each CTC's Call for Projects.	work with the CTCs and local jurisdictions to develop a methodology to quantify the needs of active transportation users.
100-14	Beth Steckler	Move LA	f. Work with CTCs to ensure full participation of all counties in the funding and implementation of regionally significant transit and goods movements systems that achieve regional objectives like cleaner air, reduced greenhouse gases, expanded access to high quality transit, and mode shift away from driving alone. SCAG should encourage county transportation commissions to place a higher priority on investment in transit services and active transportation projects and seek to ensure a fair share investment in these projects among counties either by identifying new revenues locally, shifting funds out of other programmed projects, or participating in the creation of regional revenue sources, and encouraging infill development strategies that keep our momentum toward a higher regional sustainability strong.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments. We recognize the need for additional investments in transit and active transportation and will consider your request in developing the final RTP.
100-15	Beth Steckler	Move LA	3. Create a tighter link between transit and land use throughout the region. The draft SCS takes into account changes underway in the regional real estate market including the shift in new housing development away from the construction of single family homes on large lots and toward the development of multifamily housing -- apartments, townhomes and condominiums -- in more urban environments with easier access to jobs, service and transit systems. The fact that half of all new homes and new jobs will be located near transit under the plan will be a boon to the region's efficiency, economy and sustainability. The demographic and real estate trends, more transit opportunities and healthier, active lifestyles, portend a new, and better, version of the American Dream in Southern California. By focusing development in transit areas and downtowns, the draft SCS plan would consume 408 square	Comment noted.

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			miles less "greenfield" land than in the 2035 Baseline, which assumes current land use trends.	
100-16	Beth Steckler	Move LA	a. SCAG should identify to local jurisdictions adjustments in land use policy that would ensure each county is contributing its fair share to meeting regional goals of cleaner air, reduced greenhouse gas emissions, expanded access to high quality transit, and mode shift away from driving alone. Although the region as a whole will achieve reductions in vehicle miles traveled sufficient to meet the targets for reducing greenhouse gas emissions, the reductions are not evenly distributed across the region. These outcomes are the result of both past decisions and future actions reflected in this draft SCS and RTP. The maps in the RTP/SCS suggest that in some areas, especially Riverside County, significant growth is projected in areas with little or no transit investment.	Comment noted. SCAG currently has a number of mechanisms for monitoring implementation of the RTP/SCS at the regional scale. Those include periodic reports on State of the Region, local profiles, Performance Monitoring and Assessment Program, periodic household travel survey and bi-annual FTIP update. SCAG will consider further updating our monitoring program for the RTP/SCS in coming years. Please note that SCAG promotes not only transit-oriented development, but also transit-ready developments, particularly in the outlying areas of the region.
100-17	Beth Steckler	Move LA	b. Limit High Quality Transit Areas, especially along freeways in low-density areas, to within a 1/2 mile of the stop with frequent services, as opposed to including the entire corridor. It is unclear how SCAG defines high-quality transit areas. Under SB 375, a HQTA is a place that has bus service with headways of 15 minutes or less during commute hours. Several freeway corridors are designated as HQTAs presumably because they have express bus service. But, there is not currently frequent bus service along the I-10 east of I-215, I-15 north of I-10, I-15 south of the 61, and the 33 (Ventura County) which are all designated as HQTAs. Only the area within ½ mile of the stop should be regarded as an HQTA.	Comment noted. "California Public Resources Code defines a "high quality transit corridor" as one having fixed route bus service with service intervals no longer than 15 minutes during peak commute hours, or, as per California Public Resources Code Section 21064.3, a "major transit stop" is site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon commute periods. SCAG has a statutory mandate to follow these definitions. Transit services in the I-10, I-15, and I-215 corridors have been identified in a series express service projects as express bus service with headways no longer than 15 minutes during the peak commute hours. SCAG has no mandate to challenge the statutory definition of an HQTA.
100-18	Beth Steckler	Move LA	Include a snapshot of the current jobs-housing fit and develop a methodology for projecting the jobs-housing fit as a result of transportation investments and land use changes for the 2016 RTP/SCS. The current mismatch between the location of jobs and housing is at the root of our transportation problems. SCAG should set a baseline for a jobs-housing fit by taking a "snap shot" of 4-to-5-mile buffer zones around major job centers, and then comparing the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good fit. UC-Davis and	Comment noted. After Plan adoption, we will continue to work with our stakeholders to identify appropriate metrics for analyzing and monitoring key assumptions and outcomes.

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			the Sacramento Council of Governments have developed a relatively simple methodology to do a jobs-housing fit, and are now developing a tool to project the jobs-housing fit into the future. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas.	
100-19	Beth Steckler	Move LA	Strengthen Conservation Planning Policy We commend SCAG for including an advanced mitigation strategy for land conservation. This strategy is an important step forward. We recommend the following changes to strengthen the Conservation Planning Policy section: § change "critical habitat" to important natural lands because of its limitation to the federal designation and its relationship to endangered and threatened species; § create an inclusive process for agencies, conservancies, and non-profits to help map and prioritize priority conservation lands; § include all unprotected undeveloped lands in the inventory of potential mitigation location sites instead of limiting opportunities to just Natural Communities Conservation Plan and Habitat Conservation Plan areas; § expand the conservation activities to include existing and/or future programs instead of simply already-established programs; and § Advocate for the advanced mitigation policy to result in the environment ending up better than it started as opposed to no gain (a net environmental benefit) from the standpoint of natural resource lands after construction activities.	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, based on input from a wide variety of stakeholders. Language has been clarified. It is SCAG's intent to defer to the CTCs to determine the best conservation mechanism for its region with appropriate public input and guidance from the resource and permitting agencies.
100-20	Beth Steckler	Move LA	4. Take greater measures to reduce greenhouse gases and other emissions from freight. We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the RTP in other areas. In particular, CO2 emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035. Even more dramatically, CO2 emissions from rail would increase at least 50% by 2023 and at least 123% by 2035. To mitigate goods movement related emissions, we recommend that SCAG take the necessary steps to: a. Ensure the ports augment the Clean Air Action Plan by creating GHG reduction plans.	Comment noted. SCAG recognizes that goods movement is a major source of emissions that contributes to regional air pollution problems that can have adverse health impacts. As such, SCAG's recent goods movement planning initiatives have focused on integrating environmental strategies as identified in the 2012 RTP Goods Movement Appendix. SCAG also recognizes that goods movement is a major source of greenhouse gas emissions that contribute to global climate change. SCAG's efforts to facilitate clean goods movement activities (application of near-zero and zero emission technologies) can also contribute to GHG reduction goals. Further, SCAG's goods movement environmental strategy is based on recent analyses

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			b. Devise a set of strategies that account for the differences among local freight service and that of port origin/destination. Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector's 2nd largest emitter of NOx. c. SCAG should identify and promote a sequence of projects that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost. d. Clean up existing freight corridors, not just the proposed new projects. While we welcome zero emission technology by the year 2035, more short term gains should be implemented. SCAG should further analyze what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology).	of a wide range of technology options that are currently available and/or under development. SCAG's recent studies also consider the application of these technology options for the various goods movement market segments (e.g., drayage, domestic trade, local, etc.). Further clarification will be provided in the text of the RTP regarding more near-term initiatives, including demonstration projects.
100-21	Beth Steckler	Move LA	Improve public health monitoring and benefits, especially in environmental justice communities. We applaud SCAG for adopting a number of performance "outcomes" — in particular, those measuring public health and affordability — that will be monitored during RTP/SCS plan implementation. We believe that these additional performance metrics should be reported to the Regional Council as a way to help encourage implementation of the RTP/SCS. While we understand that SCAG has no authority over local land use or county transportation planning and funding, we do believe that it's critical that SCAG find ways to incentivize RTP/SCS implementation.	Comment noted. The performance measures portion of the 2012-2035 RTP/SCS has been developed through extensive participation and input from stakeholders in the region, as well as collaboration with other large MPOs in the state. For example, to facilitate the dialogue and development of performance measures for the 2012-2035 RTP/SCS, a Performance Measures Subcommittee was established in May 2011. The Subcommittee met and gathered extensive input from various stakeholders and provided recommendations to the Plans and Programs Technical Advisory Committee for further discussions prior to forwarding to the Policy Committees. As a result of the input process and deliberations, over 20 new performance measures have been added to the RTP/SCS including new categories such location efficiency. In addition, performance measures are also developed in two types based on their intended uses: one for alternatives evaluation and the other for on-going monitoring. Building on the progress, staff will continue investigating additional measures for future plan updates.
100-22	Beth Steckler	Move LA	Evaluate the impact by geography of RTP/SCS investments on environmental justice communities by increasing monitoring	Comment noted. In previous Regional Transportation Plans (RTP) as well as for this Plan, hot spots of emissions and noise

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			over successive RTP/SCSs. The disparate impacts of transportation investments and land use planning — especially noise and pollution — on lower-income communities is lost in the county-wide or region-wide averaging that SCAG uses. It would also be informative if SCAG monitored a number of geographic areas where environmental justice populations are overrepresented. The Metropolitan Transportation Commission in the Bay Area, for example, does "snapshot" analyses of 44 geographic communities to focus on key transportation-related indicators such as transit service frequency, walkability, access to essential destinations by a 30-minute transit trip, housing and transportation affordability, bike and pedestrian collisions, diesel PM2.5 emissions, etc. For example, the EJ appendix reports that air quality will be worse for 23-29% of the population with no indication of where they live, making it difficult to design and evaluate the effectiveness of mitigation measures. SCAG is planning to track characteristics in 125 transit stations. We recommend instead that SCAG analyze 125 places where environmental justice populations are overrepresented. The analysis could be used to monitor progress over successive RTP/SCSs, and goals could be set and strategies identified to reduce disparate impacts. Where there are disparities, SCAG should propose mitigations and work with the CTCs to improve conditions. Because the EJ analysis also suggests that low-income people are being displaced from station areas, we also recommend that rail and possibly BRT stations be monitored for the impacts of gentrification — by checking income levels, housing costs, transit usage and car ownership, etc. SCAG could also develop a toolbox of policies, implementation measures and funding sources that could be used to help low-income people continue to live near stations.	concerns are identified, presented, and mapped in the Environmental Justice Appendix. SCAG will take the comment and suggestion into consideration to expand its existing efforts and establish a region wide monitoring program to focus on selected environmental justice areas and communities of concern. While the EJ analysis in the Draft RTP did show some locations with emissions increases, this analysis did not account for plan improvements in vehicle technology particularly for truck only corridors. These corridors in the plan are exclusively for zero and near-zero emission vehicles. If these emission improvements had been accounted for we believe the analysis would show no hot spots associated with the plan. As such, the emissions and exposure analysis shown in the Draft EJ Appendix is abundantly conservative and demonstrating worst-case scenario outcomes. Even in the event that hot spots remain after accounting for vehicle technology improvements, there is no reliable way to conclude hot spots would overlay with EJ communities. Neither the available data on emissions nor on distribution of households and population is at a precise enough level of geography to show where they would intersect.
100-23	Beth Steckler	Move LA	Improve the discussion around performance outcomes and alternatives analyses. One of the best ways that SCAG can do this is to help make the outcomes of land use planning and transportation investment choices clearer to Regional Council members and the general public — through reporting on performance outcomes. While the Alternatives 1, 2, 3 & 4 presented at the summer workshops	Comment noted.

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			illustrated the impacts of particular policy choices, the Alternatives A, B, C & D were different in ways that were hard to understand. We recommend that in the next RTP/SCS, SCAG should give stakeholders more time and more information to evaluate the different scenarios. We also recommend that SCAG set targets for performance measures and outcomes, and to evaluate the scenarios against these targets early and continuously in the planning process.	
100-24	Beth Steckler	Move LA	Develop new tools for measuring health & equity impacts in future RTP/SCSs. We also believe that SCAG should develop new tools for measuring health and equity impacts in future RTP/SCSs. In particular: SCAG should enhance efforts to measure the daily amounts of walking and biking related to work and non-work trips. SCAG should also measure chronic disease rate changes based on transportation decisions and resulting physical activity (based on the work of Neil Maizlish of the California Department of Public Health's work with the MTC in the Bay Area and ongoing work with MPOs across the state). SCAG will monitor premature mortality due to PM2.5, which is important since the region contributes 53 percent of premature deaths in the state of California due to PM2.5. We recommend SCAG report improvements every two years, and develop a more precise goal in collaboration with the LA County Department of Public Health and the American Lung Association in California. SCAG should monitor asthma incidence and exacerbations due to NOx (an emission that is being measured) in collaboration with the California Department of Public Health, the South Coast Air Quality Management District, academic institutions, and others who are focusing on communities most impacted by air pollution, as well as communities located near high volume roadways.	Comment noted. Comments and suggestions noted. SCAG's current planning and research effort is to enhance the Sustainability Tool (ST) by refining its base data on the built environment, and through collecting information for the following areas (1) health outcomes, (2) safety - pedestrian & bike accidents and injuries, (3) emissions (PM, CO, CO2, NOx, Ozone) and air quality (dispersion), (4) energy usage (electricity & gas), (5) water usage, (6) water quality (total maximum daily loads - TMDL), (7) Vehicle Miles Traveled (VMT) and accessibility, (8) various environmental indicators (such as pollutant information available from the US Environmental Protection Agency's Toxics Release Inventory (TRI)). Once this information is obtained, staff can conduct a correlation and modeling analysis to link the built environment and determinants (road, freeway, transit, school, hospitals, etc., buildings, design, fast food and or healthy food access, park, open space, walk/bike ways) with the environmental outcomes listed above. SCAG staff has obtained health data from Los Angeles County Department of Public Health, parcel level gas and electricity consumption data, and water consumption data for certain localities. We anticipate there will be many collaborations and technical exchanges with stakeholders in various policy areas with the aim of reaching consensus on recommended approaches in this effort and best practices for the use of the tool.
101-01	Beth Steckler	Move LA	I want to talk about three things that are really important that can use some serious study and hopefully revision before the final plan is presented to the Regional Council. • High Quality Transit Area – these are areas that are defined in State law as being places where during commute hours we have bus service with at least four every hour or fifteen minute headways. Looking at the general maps in the Appendix, I see areas where I	Comment noted. Daily train service to the Coachella Valley is in the Strategic Plan of the RTP, and express bus service to the Coachella Valley from the Inland Empire is in the Constrained Plan.

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			can't find bus service. They tend to be the areas that extend along a high quality transit area that goes along the 10 Freeway out to Palm Springs and I think a lot of us would like to get to Palm Springs on transit and it's really hard to do. Amtrak only runs three days a week and it's usually not on time. Let's say if the Amtrak service were to increase, since it only stops three places between L.A. and Palm Springs, we should be looking at the half mile radius around those stations rather than taking in the entire corridor because for those people just because a train goes by them it does not mean that they have access to high quality transit. Increasing the bus service in a lot of areas would be a way to create a high quality transit area. We need to have a lot of them because the assertion is that fifty percent of our new homes, our growing population, and our growing jobs will be in these high quality transit areas.	
101-02	Beth Steckler	Move LA	• Jobs Housing Fit – SCAG has done a lot of work in this and it's not an easy field, particularly with the demise of the CRA but I would propose that the jobs housing mismatch that we have in this region is one of major underlying causes of our air pollution and our traffic congestion. SCAG has described various things but has put no programs in. The local cities and counties need help solving this problem. A lot of it is about affordability. Getting on handle on where the mismatch is and what we can start doing to correct it is important. At UC Davis they have a very simple methodology that can be done with this RTP, which is to look at our job centers and take a 4-5 mile buffer around them. Check our currently, not projecting, what are the wages and how much does the housing cost. We will see for example in the Westside that the housing is really expensive. We want to work with SCAG to figure out how this concept of jobs housing fit really becomes something that we're working to solve just like we are working to solve the traffic problems and the air quality problems.	Comment noted. During implementation of the RTP, SCAG will continue to work with our stakeholders to identify appropriate metrics for analyzing and monitoring key assumptions and outcomes.
101-03	Beth Steckler	Move LA	• Environmental Justice Analysis – This is greatly improved over the last RTP, one of the things that could improve it further is in the EJ analysis is a proposal that SCAG will monitor what is going on at 125 transit station to see if we are really pushing poor people out and things like that are going on. That sort of idea of looking at a place, because most of the EJ analysis deals with population so we talk about all of the people who don't have	Comment noted. SCAG is continuing to monitor and track place-based development/growth and any associated environmental and safety indicators for future Environmental Justice studies.

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			cars, or don't have high school educations, or don't speak English, or who are Seniors. To talk about those people as a group across a region gives us one picture but to talk about what's happening in Wilmington along the 710 and whether the RTP makes that better or worse is a completely different picture. That's part of the picture we need to understand, we know that we have lower income populations living in the places with the dirtiest air and the worst traffic. Coming down to a kind of place based analysis within the EJ would really strengthen it. SCAG is starting to get there with the 125 train stations but it would really be strengthened if we also did it with twenty three and twenty eight percent of the population is going to have worse situations around some of the air pollution, around some of the particulate matter and the carbon dioxide.	
102-01	James Camp	NAIOP	The funding for the RTP is also of great concern. Federal law does require that the plans be fiscally constrained such that any funding is available or reasonable expected to become available. Yet, the draft RTP claims to be an approximate $524 billion program, but has a shortfall of $219 billion in revenues; nearly half. There is a reference to about $127 billion of the shortfall being reliant on major State and/or Federal actions, which seem awfully speculative. NAIOP has a major concern over the numerous references in the documents to pushing local jurisdictions to adopt new fees or taxes. The commercial/industrial development industry is already heavily burdened with fees from many, many regulatory agencies and jurisdictions. We often hear that some new fee is not that big, or is for a great cause. Yet, the net effect is a mountain of "little fees". Sort of a death by a thousand fees. To make up billions and billions of revenue shortfall would necessitate extensive new fees and taxes. This would clearly be a huge hindrance, if not not paralyze, any type of economic recovery in the regions. NAIOP did not see any type of analysis in the documents that would lead one to believe such fee and tax increases are reasonably possible, especially in light of Proposition 22, nor an analysis of the economic impacts. Such analyses are needed before any of the documents are finalized.	Comment noted. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources are less than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. An analysis of the economic impacts of the RTP is provided in the Economic and Job Creation Analysis of 2012 RTP/SCS Appendix. The financial plan for the RTP does not require nor assume that local jurisdictions adopt any new fees or taxes.
102-02	James Camp	NAIOP	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 50.
103-01	Adriano	Natural	On behalf of the Natural Resources Defense Council and the	Comment noted. Further clarification has been provided in the

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	Martinez	Resources Defense Council	Coalition for Clean Air, we write regarding the need for a near-term clean freight projects in the Regional Transportation Plan ("RTP"). Specifically, we are concerned that there is not an emphasis in the RTP on near term projects that will help the region achieve its technology goals of creating a zero or near zero emission freight movement system.	text of the RTP as appropriate.
103-02	Adriano Martinez	Natural Resources Defense Council	Accordingly, we respectfully ask that the RTP be amended to include short term projects in the constrained plan that will help advance cleaner technologies in the short-term.	Comment noted. Further clarification has been provided in the text of the RTP as appropriate.
103-03	Adriano Martinez	Natural Resources Defense Council	In the 2006 Clean Air Action Plan ("CAAP"), adopted unanimously by both Boards of Harbor Commissioners for the Ports of Los Angeles and Long Beach, the ports committed to develop and implement a zero emissions container movement system. In pertinent part, the Port boards declared that — This component of the program is focused on finding the next generation of transport solutions for goods movement. The ultimate goal is a 21st century electric powered system that will move cargo from our docks to the destinations within 200 miles that today are moved by truck. It may take 20 years to complete such a system but it will always be 20 years away unless in the next five years we build and test a demonstration prototype and perfect a detailed plan for widespread construction.	Comment noted. Cooment noted.
103-04	Adriano Martinez	Natural Resources Defense Council	Here we are six years later, and we are no closer to actual implementation of a zero emissions system.	Comment noted.
103-05	Adriano Martinez	Natural Resources Defense Council	While there are a lot of discussions about these technologies, there is an imperative need for SCAG to be leaders on this issue. In that vein, SCAG needs to provide more support for this concept in the near-term.	Comment noted. Further clarification has been provided in the text of the RTP as appropriate.
103-06	Adriano Martinez	Natural Resources Defense Council	The RTP should be amended to include a project or projects that will help spur technology. A catenary system along the Terminal Island Freeway serving to connect the Port of Long Beach to the Union Pacific Intermodal Container Transfer Facility ("ICTF") merits inclusion in the constrained portions in the plan.	Comment noted. Further clarification has been provided in the text of the RTP as appropriate.
103-07	Adriano Martinez	Natural Resources Defense	In the same vein, the RTP could also include other similar projects, including a catenary system along Alameda Street in the harbor area.	Comment noted.

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103-08	Adriano Martinez	Natural Resources Defense Council	At least one of these projects must be pushed forward in the near-term (e.g. next two years).	Comment noted.
103-09	Adriano Martinez	Natural Resources Defense Council	The cost of such a system is estimated to be between 5 and 6 million dollars per mile on the high end.	Comment noted.
103-10	Adriano Martinez	Natural Resources Defense Council	Furthermore, dollars should be allocated to procure trucks that can use this system. Accordingly, we recommend an initial allocation of 35 million for the entire project with the creation of a plan to increase the percentage of trucks that use this facility.	Comment noted.
103-11	Adriano Martinez	Natural Resources Defense Council	Funding for this project could come from some combination of the ports, agencies responsible for clean air locally and statewide, and private industry.	Comment noted.
103-12	Adriano Martinez	Natural Resources Defense Council	The key is to develop and implement the catenary system in the short term to help progress in actually achieving zero emissions goals.	Comment noted.
103-13	Adriano Martinez	Natural Resources Defense Council	Finally, the catenary system should be incorporated as an enforceable measure in the State Implementation Plan.	Comment noted.
103-14	Adriano Martinez	Natural Resources Defense Council	This type of strategy provides an ideal Transportation Control Measure. See 42 U.S.C. § 7408(f)(v), (vi); see also 42 U.S.C. § 7511A(e)(4).	Comment noted.
103-15	Adriano Martinez	Natural Resources Defense Council	We would be delighted to collaborate with staff in determining how these projects should be included in both the constrained plan and the State Implementation Plan as an enforceable measure to push progress towards a true zero emissions system.	Comment noted.
104-01	Amanda Eaken	Natural Resources Defense Council	I. Commit to the Creation of a Sustainable Transportation Network While SCAG has received much praise for the land use assumptions in its Sustainable Communities Strategy, it is unclear whether the transportation system has been adjusted	Comment noted. The 2012 RTP/SCS encourages an enhanced nexus between land use, transit, and active transportation. Much of the transit and active transportation facilities included in the plan will improve this nexus by increasing TOD, reducing

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			to support this land use pattern. While we recognize that SCAG must use input from its six County Transportation Commissions (CTCs) as the starting point for SB 375 scenario planning, we had hoped that the evaluation process would not end there. The problem, in our view, with the limited approach SCAG has adopted is the inconsistency between the varied land use projected across several scenarios and a transportation system that has been kept relatively constant. Such an approach ignores the evidence that land use patterns and transportation systems are frequently mutually reinforcing. The walkable compact development patterns SCAG calls for are less likely to materialize without adjustments to its transportation network, particularly in the Inland Empire. Similarly, compact land use patterns need to be serviced with real transportation choices if they are to be viable. We seek a commitment from SCAG, through its next SCS process in four years, to evaluate scenarios which consider what environmental achievements may be possible with a transportation system that is more varied across those scenarios.	SOV travel, and reducing VMTs.
104-02	Amanda Eaken	Natural Resources Defense Council	In particular, we find the emphasis on arterial widenings to be of concern. SCAG's EIR claims that it will spend $22 billion on "local arterial improvements". A review of the SCAG project list indicates that by improve, the clear intent is to widen, or as some engineers describe it, to "rationalize" the system. Throughout the RTP project list, the verb widen is one of the most commonly found. And yet, the empirical literature on induced demand and induced growth makes clear that widening roads does not solve traffic congestion, and, as a recent poll demonstrates, the voters agreeii.iii The futility of attempting to remedy congestion through arterial widening alone is perhaps best elucidated in Riverside County, where, despite an investment of more than six billion in arterial improvements, the County's residents can expect no marked improvement in hours of delay. Instead, the County projects an increase in hours of delay. While some of these arterial widenings may be represented in sales tax measures, County Transportation Commissions have significant latitude with respect to the phasing and prioritization of investments in their regions.	Comment noted. It is important to note that without the RTP/SCS investments, Riverside County is projected to experience a greater than four-fold increase in delay over current conditions. The benefits expected from all of the RTP/SCS investments, including arterial investments, should not be discounted. Also, it is true that the county commissions have authority over the phasing and prioritizing of investments, and the RTP/SCS reflects the priorities as identified by the commissions to SCAG.
104-03	Amanda Eaken	Natural Resources	Before continuing to our specific recommendations, we would like to note the absence of certain data which would have been	Comment noted. We appreciate NRDC's understanding that the requested data would have required extensive analysis that

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		Defense Council	valuable in further scenario analysis. The transit and active transport appendices of the plan contain a wealth of data, categorized by county, concerning the current availability of transit and active transportation elements. What is lacking, however, are projections of how the current plan improves (or does not, as the case may be) access to transit and active transportation facilities for the residents of the various SCAG counties by 2035. We have submitted a request for the data to SCAG staff. We note that SCAG staff has been both helpful and responsive, but, as we were informed by staff, the data could not be made available in time for analysis in this comment letter. Our recommendations for improving the transportation network are as follows: 1. Accelerate funding for Metrolink to provide badly needed regional commuting options The Metrolink commuter rail system, which links numerous communities in all SCAG area counties, is already a critical component of SCAG's transportation system, and, with improvements, could become a major source of VMT reduction, congestion relief and economic development. The Draft Plan includes a Strategic Plan section with projects deemed important by the region, but for which funding does not currently exist. We strongly recommend moving the upgrading of the Metrolink commuter rail system into the Constrained Plan. The upgrade project would provide double tracking, grade separations and other modifications where needed to enable expanded express service, while making a planned transition to an all-electric system capable of providing zero-emission high-speed service (up to 110 mph) in select corridors. Such an upgrade could provide significant returns in the form of congestion relief, emission reductions, and economic opportunity created, as well as create enhanced opportunities for transit-oriented development.	could not have been performed by the end of the RTP/SCS public comment period. Regarding the comment regarding Metrolink, improvements to the Metrolink system are included in the Constrained Plan, with additional improvements included in the Strategic Plan should additional funding become available.
104-04	Amanda Eaken	Natural Resources Defense Council	2. Explore bus and bus rapid transit expansions to provide high quality, cost-effective transit to a majority of residents Eighty percent of transit ridership in the region takes the form of bus travel. Considering the long lead times involved with capital expansion projects, expanded bus service may present the most immediate and cost-effective strategy to provide alternatives to driving for millions of SCAG residents. And yet in Riverside County, projected to house another 1.1 million residents over	Comment noted. The Constrained Plan of the RTP includes an increase in bus service frequency and new Express and BRT services in the region, including Riverside County.

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			the life of the RTP (second only to Los Angeles County in growth projections), only 10% of the population is currently served by high quality bus service (less than 15 minute headways). Currently 40% of residents have access to 15-30 minute headway service. SCAG should identify potential service frequency upgrades which could provide a significantly higher proportion of the population access to high quality transit service. SCAG should identify strategic investments to increase ridership in light of the new revenues which may be available through the AB 32 cap and trade revenue. In fact, we would like to urge SCAG's Regional Council to adopt a policy commitment that any new revenues received through the cap and trade program be prioritized for efficient transit operations. The public transportation literature indicates that for every 1 percent increase in transit service frequency, ridership increases up to 0.5 percent and a similar increase in vehicle miles or vehicle hours of service can increase ridership up to a range of 0.6 to 1% (Evans, 2004)iv. The highest-performing lines could be candidates for upgrade to Bus Rapid Transit, which could, in turn, serve to anchor development along now low-density transportation corridors. SCAG and its CTCs should examine the highest-performing lines, and potentially recommend them for upgrade to fixed guideway systems in this RTP.	
104-05	Amanda Eaken	Natural Resources Defense Council	3. Commit funds for bicycling and walking commensurate to the share of trips these modes accommodate SCAG has increased bicycle and pedestrian funding from $1.8 billion to $6 billion in this plan. While this is more than a 200% increase, for which staff should be commended, it still accounts for just over 1% of the plan's total funds. This is hardly commensurate with the 20% of total trips taken on foot or by bike. The recent poll of SCAG region voters conducted by NRDC, Move LA and ALAC found that, by strong contrast, voters believe 14% of RTP funds should go to making walking and biking safer. SCAG should continue to examine the balance of funds which constitute the $524 billion regional transportation plan, and investigate whether there are ways to free up additional funding for these most sustainable forms of transportation. For example, SCAG proposes to spend $22 billion widening arterials in the six county region. If some of these funds were instead directed to ensuring that these roads are "complete streets" – safe for	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.

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			walking and bicycling, the region would be taking real steps towards encouraging sustainable transportation. SCAG should encourage CTCs and local jurisdictions to adopt complete streets policies so that bicycle and pedestrian improvements can be made routinely and more economically when streets are improved or built. Widening arterials will neither encourage other modes nor solve traffic congestion. We believe committing $6 billion to bicycle infrastructure and $6 billion to pedestrian safety improvements is actually a very reasonable request, and would still represent just 2.3% of total plan revenues for these modes.	
104-06	Amanda Eaken	Natural Resources Defense Council	4. Commit to collaborating with County Transportation Commissions to Prioritize Projects which help to reduce VMT and GHG Emissions While SCAG does not make final decisions about transportation projects – its CTCs do—SCAG does play an important role analyzing the social and environmental impacts of alternative investment decisions. In its upcoming TIP process, as well as the next SCS/RTP, we recommend that SCAG adopt a process similar to the Bay Area Metropolitan Transportation Commission's to evaluate whether individual projects help to achieve regional goalsv. In partnership with its County Transportation Commissions, SCAG should engage in a project performance analysis to determine whether its proposed investments help the region achieve its intended outcomes of improved air quality and health, location efficiency, improved mobility for its residents and reduced household transportation costs. Such an analysis assists decision makers in determining which projects are consistent with SCS goals. The recently conducted poll of Southern California voters found that voters think building new roads and widening existing roads are by far the least effective strategies to reduce congestion and improve air quality. Instead, voters would rather see the region focus on smarter land use and prioritize investments in transit, bicycle, and pedestrian infrastructure. It is well known that SCAG is facing a significant funding shortfall for this RTP and makes some fairly ambitious assumptions about the availability of new revenues. Perhaps a project performance assessment process could help to encourage SCAG's CTCs to adjust project priorities to contribute to overall SCS goals1.	Comment noted. SCAG will continue to work with the county transportation commissions and stakeholders to develop and refine performance measures and, to the extent practical and possible, conduct project-level performance assessments as appropriate and necessary.
104-07	Amanda Eaken	Natural	II. The RTP Must Include More Detail on Making Clean Freight	Comment noted. SCAG has included clarifying text in the final

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		Resources Defense Council	Movement a Reality in the SCAG Region As the RTP highlights, the movement of freight creates significant economic productivity in the SCAG region, but these financial benefits come at immense costs to the health and welfare of residents throughout the region, including the primarily low income communities of color nearest our freight hubs. Accordingly, any work to expand the freight movement system must concurrently push the cleanest technologies. In addition, resources must be allocated to cleaning up the already unacceptable high levels of pollution from the existing infrastructure. There is consensus amongst all regulatory air quality agencies that in order for the SCAG region to meet federal and state clean air standards on time, it must shift the freight movement system from a diesel-dominated industry to a near zero or zero emissions systems. To turn the rhetoric of moving to a cleaner freight system into a reality the RTP must be modified to include more detail. In order to achieve the long-term, speculative projects of electric freight corridors on the I-710 and I-60, we need short-term projects. The notion was eloquently put in the 2006 Clean Air Action Plan ("CAAP"), adopted unanimously by both Boards of Harbor Commissioners for the Ports of Los Angeles and Long Beach, in which the commitment was made to the develop and implement a zero emissions container movement system. In pertinent part it reads: This component of the program is focused on finding the next generation of transport solutions for goods movement. The ultimate goal is a 21st century electric powered system that will move cargo from our docks to the destinations within 200 miles that today are moved by truck. It may (sic) take 20 years to complete such a system, but it will always be 20 years away unless in the next five years we build and test a demonstration prototype and perfect a detailed plan for widespread construction.vi This prototype project will serve as the path towards actual achievement of the projects along the I-710 and I-60. Other forward looking projects should also be included in the RTP. A catenary system along the Terminal Island Freeway serving to connect the Port of Long Beach to the Union Pacific Intermodal Container Transfer Facility ("ICTF") merits inclusion. In the same vein, the RTP should also include a catenary system along Alameda Street.	RTP/SCS as appropriate. Further discussion and detail will be included about near-term demonstration initiatives.

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104-08	Amanda Eaken	Natural Resources Defense Council	These projects must be pushed forward in the near-term (e.g. next two years). Finally, the catenary system should be incorporated as an enforceable measure in the State Implementation Plan. This type of strategy provides an ideal Transportation Control Measure. See 42 U.S.C. § 7408(f)(v), (vi); see also 42 U.S.C. § 7511A(e)(4). We would be delighted to collaborate with staff in determining how these projects should be included in both the constrained plan and the State Implementation Plan as enforceable measures to push progress towards a true zero emissions system. 1 Given the recent Association of Irritated Residents vs. Environmental Protection Agency case, the region needs to adopt enforceable Transportation Control Measures (TCMs). The measures identified in this section and others are prime candidates for inclusion in a list of TCMs.	Comment noted.
104-09	Amanda Eaken	Natural Resources Defense Council	III. Ensure Projects Meet a Robust Definition of SCS Consistency in order to Qualify for SB 375 California Environmental Quality Act Streamlining SCAG's EIR sets too low a bar for compliance with the SCS in order to achieve SB375's contemplated CEQA. Specifically, the EIR states that: "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 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." We are particularly concerned that the standard established by this EIR--specifically the meager requirement that a project merely not prevent the achievement of a designated density for a certain development type--leaves it open to easy manipulation. It would seem to be quite easy for an individual project, of substantially lower density than that which is envisioned in the SCS, to justify its consistency with the SCS simply on the grounds	Comment noted. The final RTP/SCS has been edited to state that lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining consistency of any future project with the SCS. SCAG staff may provide a lead agency at the time of its request readily available data and documentation to help support its finding upon request.

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			that higher density projects are imagined in the future. We strongly recommend that SCAG adopt a more stringent standard for consistency with the SCS in order to achieve the SB 375 CEQA benefits. At a minimum, we suggest the following language as an alternate standard: so long as the project promotes 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.	
104-10	Amanda Eaken	Natural Resources Defense Council	IV. Commit to increased Compass Blueprint funding to ensure Local Governments have adequate resources to implement the Sustainable Communities Strategy Working in close partnership with its local jurisdictions, SCAG has identified a future growth pattern which manages to save 400 square miles of open space from development. This is a highly impressive accomplishment, and it will take the sustained partnership of SCAG's local governments to follow through on the promise of this plan. To recognize their critical role as essential partners in implementation, SCAG should commit—in this plan—to an increased funding level for the Compass Blueprint program. SCAG may want to consider future revenues from the AB 32 cap and trade program as a potential funding source for this investment. Funds should be prioritized to local governments who plan and zone for growth consistent with the SCS.	Comment noted. Through the Compass Blueprint Program, SCAG has worked with and provided direct technical assistance to 94 separate jurisdictions including local cities, counties, non-profits, and transportation agencies. Future calls for applications will focus on local implementation of SCS strategies, and will prioritize projects located in High Quality Transit Areas (HQTA). In addition, other local and regional funding agencies have begun to incorporate Compass Blueprint principles into their discretionary funding programs. SCAG will continue to pursue dedicated and discretionary funding streams.
104-11	Amanda Eaken	Natural Resources Defense Council	Conformity We have reviewed SCAG's conformity demonstration for the 2012 RTP, and have identified the conformity finding for PM 2.5 in the 2014 milestone year as potentially problematic. According to the report, the PM 2.5 budget for that year is 35 tons, while estimated emissions are calculated at 34.5 tons a difference of just one half ton. (Transportation Conformity Report at p. 20.) This means that the integrity of the conformity finding will be fatally compromised by even small errors in future estimates of emissions. There is an even chance that this half-ton difference is illusory. According to ARB's June 20, 2011 revisions to the PM 2.5 transportation conformity budget, included with this letter, the 35 ton 2014 PM 2.5 budget is rounded up to the nearest ton.vii (See Table C-3 at p. C-10.) Because estimated emissions for that year are 34.5 tons, there is a 50% chance that the rounding error exceeds the difference between the 2014	Comment noted. As required by the California Air Resources Board and stated in the Transportation Conformity Report (page 16), the RTP emissions values in the summary tables follow the same rounding convention used by ARB to set the budgets (i.e., any fraction rounded up to the nearest ton). Pursuant to the Transportation Conformity Regulations, to demonstrate transportation conformity, the RTP emissions must be no greater than the corresponding emission budgets.

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			budget and estimated emissions. Use of a "rounding up to the nearest ton" method of establishing the emissions budgets, when the difference between emissions and the budget is half a ton, means that the conformity finding is random; there is a 50% chance that emissions exceed the budget. This is logically indefensible and manifestly arbitrary and capricious. We believe that the aforementioned improvements to the regional transportation system work toward amelioration of this problem. We also urge staff to commit to modeling alternative transit scenarios in the next SCS/RTP process in order to fully ascertain the potential environmental benefits.	
104-12	Amanda Eaken	Natural Resources Defense Council	VI. Conclusion SCAG staff has taken significant strides with this SCS to set the region on a more direct path to sustainability. In particular, the land use pattern shows a substantial deviation from years past in its attempt to provide opportunities for Southern California residents to live in walkable communities with affordable, convenient transportation options. We feel more work is necessary to adjust the priorities in the transportation system to ensure it is worthy of the ambitious changes to the land use pattern SCAG envisions. We have been honored to work so closely with your excellent staff through the process of creating this plan, and we look forward to the critical implementation phase in the years to come.	Comment noted.
105-01	Bill Sherman	NO 710 Action Committee	Our group is a grassroots organization with members in northeast area of Los Angeles and surrounding communities, cities, neighborhood councils, and groups that have taken official positions against the SR-710 extension that represent over 500 thousand people. At this time, we suggest and request that SCAG remove from the RTP all line items associated with expansion and extension of the SR-710 freeway. It is unreasonable to consider the 22 billion dollars from tolls, the Fast Forward American Funding, and the PP Funding Method as real possibility. The probabilities of these being available is very precarious, this funding is more of a hope than a plan. We are aware that there are significant differences between the traffic modeling of SCAG and Metro. These differences need to be resolved before the SCAG RTP can really be considered as a valid study. I mentioned specifically the Light Truck Study, which was performed in 2008, which concerned the truck traffic with the proposed 2035 traffic analysis of the 710 tunnel. The Metro	Comment noted. SCAG's 2012 RTP is consistent with fiscal constraint requirements set forth under applicable federal regulations and guidance, including the requirement that strategies for ensuring availability of new funding sources be identified. See 23 CFR 450.322(f) (1). "Fiscal constraint" means, in part, that the RTP includes sufficient financial information for demonstrating that projects in the RTP can be implemented using committed, available, or reasonably available revenue sources. See 23 CFR 450.104. The SR-710 project is proposed to be funded by both core (Measure R) and new, reasonably available revenues. SCAG documented that the new funding sources identified for the SR-710 project are reasonably available. As such, strategies delineating required implementation steps for ensuring the availability of proposed new revenues are discussed in the Transportation Finance Appendix. The SCAG regional travel demand model utilizes the most current information and inputs, including project

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			RFP outlines a study area of 150 square miles to resolve the Gap Closure issues and does not specifically speak of a mode, route, or extension of the SR-710. Your RTP is in conflict with the EIR/EIS and undermines the entire on-going process of both SCAG and Metro. As a physician, I cannot leave without commenting on health issue. Excellent studies from USC and other well respected health institutions repeatedly have identified the health risks of freeway and tunnels, these cannot be mitigated. While jobs for LA workers are desirable, the desertion of decreased air pollution and improved traffic mobility is unproven. President Obama spoke specifically on this issue in the State of the Union Address of last month, jobs do not outweigh health. I was disappointed in the RTP in that it so twentieth century. In a country that sent a man to the Moon, can't we find more innovative solutions to these same old problems?	descriptions, growth forecast, and methodology. The RTP/SCS is a regional analysis and project-level modeling (e.g., for CEQA/NEPA, corridor studies, etc.) would be expected to be different. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling analysis.
106-01	Multiple Signers	No 710 Action Committee	We urge SCAG policymakers to remove from the RTP all line items associated with expanding and extending the 710 freeway, and remove from the RTP all items associated with expanding and increasing existing infrastructure and technology for goods movement in the region.	Comment noted.
106-02	Multiple Signers	No 710 Action Committee	In addition, the No 710 Action Committee notes that SCAG must move the proposed SR-710 Extension Toll Tunnels from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law to include them in the Constrained Plan.	Comment noted. SCAG's 2012 RTP is consistent with fiscal constraint requirements set forth under applicable federal regulations and guidance, including the requirement that strategies for ensuring availability of new funding sources be identified. See 23 CFR 450.322(f) (1). "Fiscal constraint" means, in part, that the RTP includes sufficient financial information for demonstrating that projects in the RTP can be implemented using committed, available, or reasonably available revenue sources. See 23 CFR 450.104. The SR-710 project is proposed to be funded by both core (Measure R) and new, reasonably available revenues. SCAG documented that the new funding sources identified for the SR-710 project are reasonably available. As such, strategies delineating required implementation steps for ensuring the availability of proposed new revenues are discussed in the Transportation Finance Appendix.
106-03	Multiple Signers	No 710 Action Committee	We oppose SCAG RTP items associated with proposed SR-710 Toll Tunnels because they will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks	Comment noted. The 2012 RTP/SCS is a performance based multi-modal plan that incorporates transit, highway, goods movement, and active transportation strategies to achieve

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			in our communities and throughout the region. We oppose related plan items which have the goals of increasing conventional roadway and rail yard capacity for the same reasons. The Programmatic Draft Environmental Report for the Plan is inadequate, as is stated in an addendum to this letter. These approaches are outdated, inefficient, and harmful to the region. Better, zero-emission proposals for goods movement are available now – we should not wait another 20 years.	overall improved system performance. This includes strategies for a regional zero-emission goods movement system.
106-04	Multiple Signers	No 710 Action Committee	Goods movement proposals in the Draft Plan are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan. The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (p. 68), yet allocates billions of dollars to expanding existing systems, with no requirement that new technology be implemented.	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. Accordingly, SCAG's proposed goods movement strategy includes an environmental action plan focused on the deployment of zero-emission technologies. Please refer to the Goods Movement Environmental Strategy section of the RTP Goods Movement Appendix for further clarification. Please note that SCAG does not have the authority to mandate such policies.
106-05	Multiple Signers	No 710 Action Committee	The plan says that "truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety..and provide a platform for the introduction and adoption of zero-emission technologies." However, the plan does not require zero-emission technology (which truck operators will be reluctant to invest in because of the added expense), assumes and accommodates more trucks on the road en route to proposed freight corridors, and allocates billions to construction of these corridors instead of electrified rail freight movement projects which would eliminate many trucks from inner-city traffic altogether.	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. Further, SCAG continues to support efforts by regional partners to address goods movement emissions and impacts on communities such as the San Pedro Bay Ports Clean Air Action Plan. It is not feasible to move all goods by rail, whether electrified or conventional rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. However, goods moving from the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.
106-06	Multiple Signers	No 710 Action Committee	The plan acknowledges environmental justice legislation at the federal and state level in detail and pledges SCAG's compliance with the spirit of these laws. It proposes to address freight movement and rail emissions-related impacts, but it avoids	Comment noted. Your comment has been noted. SCAG, however, maintains that SCIG is a critical goods movement initiative. We recognize that goods movement is a major source of emissions that contributes to regional air pollution problems.

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			mention of significant and sustained community opposition to the BNSF SCIG, which is on the Project List. The No 710 Action Committee opposes the SCIG in solidarity with the Coalition for a Safe Environment and other community groups that have repeatedly presented their comments and concerns related to environmental justice. These communities experience far higher than average freight truck traffic and host undesirable intermodal freight facilities. The resulting higher than average health, quality of life, life expectancy and safety problems are well documented. However, the existence of their concerns and specific objections to the SCIG are completely ignored and not mentioned in this Draft Plan or its appendix on Environmental Justice. The No 710 Action Committee repeats that SCIG and related Draft Plan components are part of an overall framework which favors conventional goods movement activities that cause significant pollution and negative impacts in neighboring communities and throughout the region.	As such, SCAG's recent goods movement planning initiatives have focused on integrating environmental strategies as identified in the 2012 RTP Goods Movement Appendix. We emphasize the need to deploy clean technologies (near-zero and zero emissions) and include an action plan for coordinating with key regional stakeholders to realize such an objective.
106-07	Multiple Signers	No 710 Action Committee	Job creation and retention goals in this Draft Plan represent "mission creep" and tilt towards requiring more trucks, more freeways, more traditional rail infrastructure, and more conventional port transfer and loading. We oppose this direction because it is part of a conceptual framework that includes the proposed SR-710 Toll Tunnels and the associated negative impacts mentioned above: pollution, truck traffic, congestion, accidents, health and environmental risks. The Port Working Group, a community coalition, has noted that the SCIG plan claims to add 400 permanent jobs, but existing businesses at the proposed site provide more than 1,200 permanent jobs, resulting in an overall reduction. Further, many of the construction jobs are not permanent, and not guaranteed to be awarded locally.	Comment noted. Considerable research and analysis indicates that significant volumes of goods will move through the regional system by 2035. These goods movement activities provide significant economic benefits to the region and nation. SCAG continues to work closely with stakeholders to identify mechanisms to support the continued growth of regional freight activity while addressing the myriad of associated challenges including air quality, environmental, and community concerns.
106-08	Multiple Signers	No 710 Action Committee	The No 710 Action Committee urges regional mobilization focusing on multi-modal transit and goods movement projects using electrified rail and zero emission technology. These will also create jobs, but the approach is forward-looking in terms of job and skills training and future infrastructure needs. In addition, more efficient, lower-cost goods movement technology will allow the Southern California region to attract jobs and new investment, competing effectively with other international and eastern seaboard ports' expansion and	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. It is not feasible to move all goods by rail, whether electrified or conventional rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. However, goods moving from

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			modernization.	the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.
106-09	Multiple Signers	No 710 Action Committee	The plan refers to zero emission electrified rail technology as a long-term goal in sections of the report covering goods movement, congestion, air quality, transportation investments, and truck transport. It proposes a long-term, bureaucratic study. It does not acknowledge that specific patents, plans and technologies are currently being proposed and discussed by several parties. The Draft Plan indirectly and incorrectly implies that such technology cannot be implemented on an accelerated timetable. This is a matter of political will and private investment, not feasibility. The No 710 Action Committee objects to the Plan's time-delay in funding and implementing zero emission strategies, because the near-term alternatives proposed in the Draft Plan include extension and expansion of freeways (such as the 710) and traditional rail yards and goods movement infrastructure which will result in added pollution, truck traffic, congestion, accidents, health and environmental risks in the region.	Comment noted. SCAG's recent study initiatives have included an assessment of electrified rail technologies. Analyses to date suggest that additional evaluation would be needed due to address operational, reliability, and safety concerns among other factors. SCAG has worked closely with regional stakeholders and will continue to investigate zero-emission options for rail.
106-10	Multiple Signers	No 710 Action Committee	We question the revenue projections in the Draft RTP. The profitability of regional toll ways hasn't been demonstrated, and the exact uses of the proposed SR-710 Toll Tunnels haven't been determined (car only, truck only, both?) yet the SCAG RTP assumes a combined $22.3 billion in revenues for the tunnels and other toll ways.	Comment noted. The RTP assumes revenues generated from toll facilities are restricted to the construction (including paying debt service associated with construction), as well as operation and maintenance of those same facilities and are not eligible for any other facility, project or program.
106-11	Multiple Signers	No 710 Action Committee	On the expense side, funding should be reallocated. The billions of dollars for freeway expansion, near-term dedicated truck lanes, the East-West Corridor, and conventional rail yard / truck loading should be spent on accelerated implementation of zero emission electrified rail freight movement and other multi-modal and active transportation projects.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenue sources, and other previous commitments.
106-12	Multiple Signers	No 710 Action Committee	The plan gives lip service to a modernized, zero emission freight movement system from ports to electrified rail, but allocates no funding for this important step that will dramatically reduce truck traffic and congestion, improve air quality and health/environmental impacts, and position this region as an	Comment noted. Further clarification of funding and near-term demonstration initiatives have been provided in the text of the RTP.

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			efficient, low-cost, high-tech goods movement magnet.	
106-13	Multiple Signers	No 710 Action Committee	The plan also admits that increased population, and a growing aging population, will need alternative forms of transportation as roads become more crowded in the region. More funding should be directed proportionally to active transportation: walking, biking, transit, and multi-modal planning. The No 710 Action Committee proposes that the SCAG RTP allocate a share of funding proportional to the anticipated users of and established needs for active transportation to foster livable, sustainable neighborhoods throughout the region and meet AB32 and SB375 greenhouse gas emission goals.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
106-14	Multiple Signers	No 710 Action Committee	SCAG RTP modeling is seriously out of date. Most of the SCAG region is classified as a non-attainment area for some criteria pollutants and an extreme non-attainment area for Ozone. SCAQMD, as the regional air regulator, has 36 air quality sensors across Southern California (Map 3.2-1) but they don't monitor pollution next to busy freeways. While the sensors may give a big picture view in accordance with federal law, "without the (freeway) monitors, there's a "glaring hole" in air pollution planning that ignores the health of more than a million people who live within 1000 feet of freeways in the AQMD's region, according to Adrian Martinez, an attorney for the Natural Resources Defense Council."1 Baseline data compiled from freeway monitors would allow us to stop the current modeling impulse to "average" pollution throughout the region, to look at health risks more accurately in nearby populations, and not claim unfounded benefits from basically shifting the pollution elsewhere without eliminating it. Current traffic modeling appears to be out of date and inadequate, as witnessed by the delay of release of the preliminary DEIR on the lower I-710 due to inaccurate truck numbers. Without considering induced demand, the true costs of building, and maintenance and operations of highways the model doesn't build adequate and accurate evidence for decision making. It leaves open to unsupported speculation that more freeways or tunnels will lessen congestion and improve air quality. There is no	Comment noted. Air quality monitoring is the responsibility of the local air districts. SCAG will convey the comments regarding air quality monitoring to SCAQMD. The SCAG Travel Demand Model is a complex analytical tool that, like the models used by our counterpart metropolitan planning agencies in San Diego, Sacramento, and the San Francisco Bay Area, represents the current state-of-the-practice with respect to regional travel demand modeling. The SCAG Travel Demand Model has undergone a series of expert panel reviews and concluded with a Peer Panel Review involving federal agencies, academics and expert practitioners from around the nation. The Peer Review Panel concluded that the SCAG Model meets and in many cases exceeds the state-of the-practice.

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			uncongested freeway in LA and car and truck volumes are projected to increase as the inborn population increases. The volume of traffic and their attendant pollutants will inevitable increase and move us towards a progressively unhealthy place to live.	
106-15	Multiple Signers	No 710 Action Committee	Since the ARB identified diesel emissions as toxic air contaminants that are carcinogenic (TACs) in August, 1998 and 14 years (3 RTPs) have passed, it would seem unlikely that the above conjecture will come true any time soon, especially with America's oil dependency. Mobile Sources Contribute to Serious Health Impacts. Mobile sources such as trucks, locomotives and automobiles create the vast majority of air pollution in the South Coast Air Basin. One type of pollutant, fine particulates, is estimated to cause 6,200 premature deaths in the Basin every year. The average reduction in life span for such persons is estimated by the California Air Resources Board and the U.S. Environmental Protection Agency to be 14 years. (California Air Resources Board, 2008 (mean estimate) 2 Health Risks Near Transportation Facilities. The AQMD Multiple Air Toxics Exposure Study (MATES III) shows that diesel particulate matter is the overwhelming contributor to regional cancer risks from air pollution which average 1,200 in a million. This is hundreds of times higher than risk levels allowed for stationary sources under AQMD rules (between 1 and 25 in a million). The highest risks from air pollution are found near highways and other transportation facilities such as the I-71 0, because of heavy reliance on diesel-powered mobile sources. Persons in highly polluted portions of the basin, and persons near transportation facilities anywhere, also suffer greater risks of reduced lung function and many other serious health effects. (SCAG Mates III analysis, 2008) 3	Comment noted. Please note, SCAG is incorrectly cited as the source for the Mates III analysis, 2008. That is an AQMD analysis.
106-16	Multiple Signers	No 710 Action Committee	The above is of particular concern to the No 710 Action Committee because of the overwhelming emphasis on goods movement and single occupancy vehicles in the RTP. The lower I-710 is listed on the projects list and proposes 4 truck lanes from the Ports of LA-Long Beach to the rail yards and 10 general lanes from the Ports to SR-60. While the upper I-710 is listed as a study (EIR/EIS) at a cost of$87,454 million, (2-27) the projects do not stand alone without consideration of the impact of the other, basically a conduit for port truck traffic into residential	Comment noted. While we understand your concerns, routes used by trucks moving through the region are primarily dictated by market segmentation and economic considerations. In other words, not every truck using the I-710 would choose to use the SR-710 given their destination points. Analysis, including a recent port gate survey conducted by SCAG, indicates that a majority of trucks utilizing the I-710, generally stay within close proximity to the Ports—with destinations, for example, to near-dock or off-dock facilities in the LA basin. Trucks with

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			areas.	destination farther out are generally moving eastward via one of the east-west corridors (SR-91, I-10, and SR-60). Moreover, the majority of trucks moving through the region are domestic and do not have an origin at the San Pedro Bay Ports. The localized impacts of trucks utilizing a completed SR-710 would be determined through the Environmental Impact Report (EIR) for the project. Additionally, truck routes and movements in residential areas are determined by local ordinances and municipalities. SCAG will continue to work collaboratively with regional partners and stakeholders on these types of projects of regional significance.
106-17	Multiple Signers	No 710 Action Committee	The 1-710 North project is also described as an Slane toll facility in a tunnel (2-13). While new schools cannot be built within 500 feet of a major highway or freeway, the reverse is not regulated. A freeway or tunnel can be built within that distance, which would result in at least 3 7 schools that are within 1000 feet of the extension and the 210 from South Pasadena and Pasadena to Sylmar being subjected to toxins from an additional 30,000 vehicles and 2,500 more trucks daily. 4	Comment noted. Project-specific issues such as proximity to schools or other sensitive receptors would generally be addressed in the project-level Environmental Impact Report/Environmental Impact Statement.
106-18	Multiple Signers	No 710 Action Committee	Tunnels concentrate pollution up to 1000 times. An Australian school district will not allow their school busses to traverse a 2 mile tunnel that is considerably shorter than that planned for the I-710 extension. 5	Comment noted. Project-specific issues such as effects of tunnels on pollution levels would generally be addressed in the project-level Environmental Impact Report/Environmental Impact Statement.
106-19	Multiple Signers	No 710 Action Committee	Health Risk Assessments (HRA) and Health Impact Assessments (IDA) The RTP must consider formal Health Risk Assessment and Health Impact Assessments for all of the 1-710 corridor communities and Hot Spot analysis for sensitive receptor community sites such as schools, daycare centers, hospitals, convalescent centers, senior centers, parks and recreation centers, athletic fields and residential areas. Health professionals must be included in the analyses. No 710 Action Committee is attaching for your reference: • Scoping comments, • 13 page Bibliography of Health/Pollution Impacts links, • Chart of Selected Health and Economic Impacts of Freight in Global Trade Impacts: Addressing the Health, Social and Environmental Consequences ... • National Transportation Objectives and Targets • Coalition for Clean Air- Top 10 facts Californians should know about air pollution and health • Coalition for Clean Air - Pollutants and Health Effects • Coalition for Clean Air - Transportation Facts	Comment noted. The formal Health Risk Assessments and Health Impact Assessments cited are being conducted as a project-level analysis for a specific project. Consideration of this analysis may affect local decisions on project alternatives. Should such local decisions result in a change to a project description in the RTP/SCS, SCAG will work with the local implementation agency (e.g., county transportation commission) to amend the RTP as necessary.

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106-20	Multiple Signers	No 710 Action Committee	Port of Los Angeles, Port of Long Beach The Ports of Long Beach and Los Angeles are the single largest source of air pollution in the South Coast Air Basin. The AQMD stated in its February 17, 2009letter regarding 1-710 Project Alternatives that "In sum, this region needs every possible emission reduction from goods movement and other mobile sources. This must include zero-emission technologies wherever possible." The agency continued by mentioning electrified rail, maglev, the Alameda Corridor Electrification, electric trucks, fixed-guideway systems, and zero emission technologies that have been available for decades with photos of electrified freight transport systems in England, France, Russia, Italy, etc. In concluding, the agency stated ''we wish to caution against any unnecessary "phasing" of the evaluation of zero-emission alternatives which could result in other portions of the 1-710 project (i.e. lane expansion) proceeding to project level analysis, possible approval and construction, prior to full evaluation and potential decision regarding the zero-emission alternative." 6 The 12/6/2010 "Development of a California Geospatial Intermodal Freight Transport Model with Cargo Flow Analysis" commissioned by CARB and CEP A states in its conclusion section "First, the Case Study quantifies port-related intermodal goods movement through the state of California and beyond. Second, the idealized use of least CO2 routing constraints illustrates how emissions savings can be achieved through modal shifts. In terms of savings in emissions, it is estimated that a total of 60% reduction in C02 emissions is achievable by a modal switch from road to rail." 7 We need no more long-term goals or bureaucratic studies as stated in the plan. The technology is available now, the studies have been done, commercial projects and lower polluting alternatives have been suggested in the 1-710 DEIR, the benefits are region wide.	Comment noted. SCAG will continue to work with stakeholders to evaluate and consider technologies as appropriate.
106-21	Multiple Signers	No 710 Action Committee	Goods movement versus people movement, by way of forms of mass transit. For Los Angeles to become truly a world-class city more mass transit by way of light rail, busses, subways or streetcar connections must be planned and implemented. Los Angeles has been the laboratory for Detroit for the last 100 years and has only been catching up with other major U.S. cities for the last 20 years. The Move L.A. " survey completed by Fairbank, Maslin, Maullin, Metz and Associates, shows that	Comment noted. The distribution of funding for different transportation investments in the RTP is a result of local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.

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			voters in the six county region served by the Southern California Association of Governments (SCAG) overwhelmingly support expanding and investing in transit over investing in highways. Even when voters backed highway spending, there was more support for a "Fix It First" approach than funneling more money into mammoth road expansion projects. Voters prioritized expanding public transportation as the most effective means of reducing traffic congestion and air pollution, said Denny Zane, executive director of Move L.A."8 The 1-710 North EIR Scoping letters ran overwhelmingly against expansion of the freeway/tunnel. Preferences are for mass transit projects that would relieve congestion, clear the air, make commutes more agreeable and efficient and put more people into one vehicle rather than single occupancy vehicles. The RTP is "front loaded" with highway projects and "back loaded" with transit. To meet our State mandates, it would make sense to move the transit projects up in the timeline and build them sooner than later.	
106-22	Multiple Signers	No 710 Action Committee	Health in all public policies. Health and health equity issues do not appear prominently enough in your overall planning. Please reference www.sgc.ca.gov/workgroups/hiap.html. Community engagement is not demanding you build more and they are the ultimate stakeholders and the ones who bear the costs and health burdens.	Comment noted. The RTP/SCS recognizes the important role that transportation and the built environment have on public health. In addition to the public health factors measured in the Environmental Justice analysis, many strategies contained in the RTP/SCS will provide widespread benefits within the region for both public health and environmental protection. For example, better place-making will allow people to use walking and bicycling more regularly in their daily lives, and promote the development of urban parks thus providing more opportunities for recreation and exercise. Furthermore, using research-based rates and valuations produced by the American Lung Association, the RTP/SCS results in a 24 percent reduction in total health incidences, and saves over $1.5 billion per year in total costs.
106-23	Multiple Signers	No 710 Action Committee	Funding an Undefined Project We are distressed to see the enormous dollars that might go to a new infrastructure project such as the 1-710 north tunnels (11.8 billion, 2007 SCAG figure). No project is actually defined yet. The EIRIEIS process is just underway and is considering multiple routes, not just one. In fact, the Technical Advisory Committee has only had 2 meetings and is dealing first with a purpose and need evaluation. Our scarce transportation dollars could be much better used in transit projects to make a healthier and sustainable region. This	Comment noted. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description, cost, and associated modeling analysis.

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			should not be in the constrained list of projects but rather removed to the strategic list. The cost estimates are way below the building costs and there are many specialized issues in concentrating pollution in tunnels. The toll revenues may not come to pass, as many municipalities have found. It is not revenue you can reliably build into the current plan. Due to no foreseeable funding in sight to complete an undefined project, the RTP must reflect reality and move the potential project from the constrained to the strategic unfunded list. We need to move to congestion pricing, reduced parking availability, higher parking costs and other incentive taxes to move us away from choosing individual mobility options.	
106-24	Multiple Signers	No 710 Action Committee	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 53.
106-25	Multiple Signers	No 710 Action Committee	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 53A.
107-01	Will Kempton	Orange County (multiple agencies)	Induced growth discussions incorrectly imply a lack of coordination between land-use and transportation planning agencies and are contrary to the balanced plans provided through the LRTP and OC SCS collaboration process. Please state that land-use plans and transportation projects identified in the OC SCS and LRTP are balanced and, if necessary, clarify under what circumstances “induced growth” may occur.	Comment noted. The reference to induced growth has been removed in the Final RTP/SCS.
107-02	Will Kempton	Orange County (multiple agencies)	New revenue sources and innovative financing strategies used to demonstrate financial constraint can have significant impacts on businesses and the economy that must be clearly understood before advancing. In fact, the RTP vision statement recognizes the linkages between economy and the regional transportation system. Specifically, details on how any new user fees would be further defined, evaluated, and advanced must be evaluated through a full economic analysis prior to final adoption of the RTP. In addition, this analysis should demonstrate, by county, the need for new revenues, how the new revenues are proposed to be invested, and how a county-level return to source mechanism can be ensured.	Comment noted. The Transportation Finance Appendix provides detailed explanation on all revenue sources included in the RTP. An analysis of the economic impacts of the RTP is provided in the Economic and Job Creation Analysis Appendix of the final RTP/SCS. We recognize that return-to-source is a critical consideration for any new revenue source.
107-03	Will Kempton	Orange County (multiple agencies)	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 58.
108-01	Kate Klimow	Orange County	There are repeated references throughout the RTP/SCS that	Comment noted. SCAG addressed these concerns within the

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		Business Council	transportation projects "induce growth" which incorrectly implies a lack of coordination between land-use and transportation planning agencies and that there was insufficient effort in the planning process to accommodate for anticipated, organic, population growth. The RTP/SCS and the PEIR should differentiate between balanced, planned growth identified by local jurisdictions, and growth that is inconsistent with what is already being planned for at the local level.	2012-2035 RTP/SCS PEIR revision approach, as presented at the Joint Regional Council and Policy Committee Workshop on the PEIR on February 21, 2012. For more information, please see the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 55. The reference to induced growth has been removed in the Final RTP/SCS.
108-02	Kate Klimow	Orange County Business Council	SCAG should identify in the plan the economic contribution of the goods movement sector to the regional and state economy and elevate the importance of the east-west corridor as critical to the future of California's position in the global economy.	Comment noted. The economic contribution of regional goods movement is articulated in the Goods Movement Appendix.
108-03	Kate Klimow	Orange County Business Council	The RTP should explicitly state how any new user fees would be further defined, evaluated (both for economic and feasibility impacts), and advanced. In particular, the analysis should demonstrate the need for new revenues and how the new revenues are proposed to be invested, while also protecting existing transportation plans as identified by local transportation entities. Voter-approved projects funded by local sales tax measures must be protected.	Comment noted. The Transportation Finance Appendix provides a detailed explanation on all revenue sources and summarizes the transportation expenditures included in the RTP. The Transportation Finance Appendix lays out an implementation plan for all new revenue sources included in the RTP. We recognize the importanceof protecting existing transportation plans adopted by county transportation commissions in the SCAG region and the voter-approved projects funded in those plans through local option sales tax measures and will continue to work collaboratively to ensure they are protected.
108-04	Kate Klimow	Orange County Business Council	With the elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is highly problematic and ignores issues related to aging or inadequate infrastructure capacity and high development costs for higher density projects. It also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. Recommendations regarding land-use should take into account the region's unique communities, market forces, and take a flexible not proscriptive approach to protect regional diversity.	Comment noted. The elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects intended to support the policies in the 2012 RTP/SCS. SCAG will continue to identify funding resources for local governments pursuing such policies.
108-05	Kate Klimow	Orange County Business Council	Finally, since passage of SB 375, the State of California has de-funded transit, transportation and redevelopment support for local government. This continues years of state diversion of revenues from gasoline, sales, income and other taxes needed for local government programs. Local government cannot achieve these mandated changes without increased, not decreased, state support. SCAG should explicitly state the imperative for state support for planning, transit, transportation	Comment noted. We agree, and our acceptance of the SB 375 regional targets was conditioned on 11 recommendations aimed primarily at restoring previous levels of state funding for transportation. We also included a mileage-based user fee and adjustments to state and federal gas excises taxes to detail specific steps necessary to stabilize state and federal transportation revenue sources, which will help ensure we have adequate resources to meet state and federal mandates.

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			and redevelopment or other necessary funding to pre-SB 375 levels in order to achieve mandated goals.	
108-06	Kate Klimow	Orange County Business Council	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 55.
109-01	Dave Simpson	Orange County Council of Governments	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.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
109-02	Dave Simpson	Orange County Council of Governments	All documents, tables, maps, narrative, modeling runs, PEIR Alternatives (including Alternative 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.	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into the SCAG's final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, Alternatives (including Alternate Creferencing the Orange County growth forecasts).
109-03	Dave Simpson	Orange County Council of Governments	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. (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 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.	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional 2012 RTP/SCS in their entirety, and as such, the policies included are endorsed by the regional plan for implementation in the sub-region. Regional strategies included in the 2012 RTP/SCS, such as financing strategies, apply region-wide. The Final 2012 RTP/SCS has been updated to address comment.
109-04	Dave Simpson	Orange County Council of	There are strategies in the OC SCS that are not included in the regional SCS. Similarly, there are some strategies in the regional	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional 2012

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		Governments	SCS that are not consistent with the strategies in the OC SCS. This creates confusion and clarification is needed. SCAG has incorporated the OC SCS in its entirety into the regional SCS as an appendix to the regional SCS, but it is unclear what the standing is of the OC SCS. The OC SCS contains a set of strategies that were agreed upon by local governments, agencies and other stakeholders within Orange County and was accepted by SCAG and should represent the SCS that is applicable to the Orange County region. Please 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."	RTP/SCS in their entirety, and as such, the policies included are endorsed by the regional plan for implementation in the sub-region. Regional strategies included in the 2012 RTP/SCS, such as financing strategies, apply region-wide. The Final 2012 RTP/SCS has been updated to address comment.
109-05	Dave Simpson	Orange County Council of Governments	1) RTP General. All chapter headings should include the Chapter number on each page for ease of reference.	Comment noted. Chapter numbers have been added, as requested.
109-06	Dave Simpson	Orange County Council of Governments	2) RTP p. 1, left col – "The 2012 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act."	Comment noted.
109-07	Dave Simpson	Orange County Council of Governments	3) RTP p. 4, right col - "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."	Comment noted. We agree that the region needs to ensure it receives its fair share of transportation funding.
109-08	Dave Simpson	Orange County Council of Governments	4) RTP p. 7, Table 2 and p. 95, Table 3.3 - Is additional $0.15 gas tax the sum total of both state and federal taxes or $0.15 each?	Comment noted. The additional $0.15 is each state and federal excise gas taxes.
109-09	Dave Simpson	Orange County Council of Governments	5) RTP p. 40, left col - "Strategic investments, put forth by the private sector, that would remove barriers associated with telecommuting are expected…"	Comment noted. The referenced language was revised as follows: "Strategic investments put forth by the private sector that would remove barriers associated with telecommuting are expected to increase the number of full-time (equivalent) telecommuters to 5 percent in 2020, and 10 percent in 2035."
109-10	Dave Simpson	Orange County Council of Governments	6) RTP p. 42, Table 2.2 - 241 toll road completion year is 2030	Comment noted. Table 2.2 was revised with the correct completion year of 2030.
109-11	Dave Simpson	Orange County Council of Governments	7) RTP p. 50, left col – "scrip", Please define in text and add to glossary.	Comment noted. This term has been added to the glossary.

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109-12	Dave Simpson	Orange County Council of Governments	8) RTP p. 54, right col - “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.”	Comment noted. We agree that the addition of “peak periods” is an appropriate addition to the referenced sentence.
109-13	Dave Simpson	Orange County Council of Governments	9) RTP p. 70, 78 -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 mitigation measures obligate regional agencies and project developers to undertake more strategies, programs and mandates beyond those included in the OC SCS. 10) RTP p. 78, right col - 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) RTP p. 80, left col - Statements are made, such as, "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 attract more of the regional population growth in certain areas of the region. This means that 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. Transportation projects in the RTP also have the potential to divide established communities, primarily through acquisition of rights-of-way.”	Comment noted. Edits regarding the percentage of GHG emissions from the transportation sector were made in the final RTP/SCS. In regard to the mitigation measures, SCAG does not intend to dictate mitigation to jurisdictions. As such, SCAG addressed these concerns within the 2012-2035 RTP/SCS PEIR revision approach, as presented at the Joint Regional Council and Policy Committee Workshop on the PEIR on February 21, 2012. The reference to induced growth has been removed in the Final RTP/SCS.
109-14	Dave Simpson	Orange County	RTP p. 82, right col - Text indicates that the RTP and projects in	Comment noted. The reference to induced growth has been

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		Council of Governments	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 include increased impervious surfaces;…"	removed in the Final RTP/SCS.
109-15	Dave Simpson	Orange County Council of Governments	12) RTP Ch. 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) RTP p. 95, Table 3.3 – Delete "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."	Comment noted. The determination of the RTP's compliance with fiscal constraint, as part of meeting air quality conformity requirements, are made at the time of plan adoption or amendment. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years. The Growth Forecast Appendix has been updated to accurately reflect the mileage-based user fee proposal.
109-16	Dave Simpson	Orange County Council of Governments	14) RTP p. 105, right col - "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 raw land available in the region." 16) p. 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	Comment noted. The final RTP/SCS includes clarifying language and addsss comment.

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			subregions. 17) p. 110, right col - “Municipal water and sewer systems, for example, ensure clean water. At the same time, 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) p. 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, graphics and maps that provide the detail that confirm this consistency.	
109-17	Dave Simpson	Orange County Council of Governments	19) p. 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	Comment noted. The subregional SCS documents submitted by GCCOG and OCCOG are incorporated into the regional RTP/SCS in their entirety, and as such, the policies included are part of the regional plan for implementation in the sub-region. Regional strategies included in the RTP/SCS, such as financing strategies, apply region-wide. The final RTP/SCS and SCS Background Documentation Appendix was updated to include clarifying language and addressreflect the comment.

ID	Name	Affiliation	Comment	Response
			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) p. 127, right col – "Gentrification", add to glossary 21) p. 128, left col - "Thus, this adjustment allowed the land use pattern to conform more closely to local general plans, while reducing the amount of vehicle miles traveled." Whose/What are "local expectations?" 22) p. 149, right col - 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 to successfully implement the SCS." 23) p. 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) p. 166, right col – "Greenfield", add to glossary	
109-18	Dave Simpson	Orange County Council of Governments	25) p. 194, right col - "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 …"	Comment noted. Referenced text amended to reflect additional SCAG committees that are publicly noticed.
109-19	Dave Simpson	Orange County Council of Governments	26) p. 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.	Comment noted. This text refers specifically to goods movement. However, any plans for a zero-emission/near-zero-emissions freight rail system could apply to the region's passenger rail system in the case of shared tracks.
109-20	Dave Simpson	Orange County Council of Governments	27) p. 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.	Comment noted. The operational improvements are consistent with the Orange County SCS.

ID	Name	Affiliation	Comment	Response
109-21	Dave Simpson	Orange County Council of Governments	28) p. 207 - Strategic Finance. Please explain what will happen if reasonably foreseeable revenue sources of approximately $200 million do not become available?	Comment noted. The determination of the RTP's compliance with fiscal constraint as part of meeting air quality conformity requirments, are made at the time of plan adoption or amendment. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
109-22	Dave Simpson	Orange County Council of Governments	29) p. 205 – "Active transportation", add to glossary	Comment noted. This term has been added to the glossary.
109-23	Dave Simpson	Orange County Council of Governments	Growth Forecast Appendix, p. 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.	Comment noted. SCAG has incorporated the OCP-2010 Modified dataset into the final growth forecast dataset for the 2012 RTP/SCS and updated all related documents, tables, maps, narrative, modeling runs, and Alternatives (including Alternate C referencing the Orange County growth forecasts).
109-24	Dave Simpson	Orange County Council of Governments	Finance Appendix - 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?	Comment noted. The majority of funds identified as reasonable available revenues (excluding core revenues), are not assumed to be available until the latter years of the RTP. The determination of the RTP's compliance with fiscal constraintas part of meeting air quality conformity requirements, are made at the time of plan adoption or amendment. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
109-25	Dave Simpson	Orange County Council of Governments	PM Appendix p. 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	Comment noted. The Performance Measures Appendix has been revised to state that the RTP/SCS performance measures are not required for use at the subregional or project-specific level.

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			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. PM Appendix p. 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." PM Appendix p. 1, col 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.	
109-26	Dave Simpson	Orange County Council of Governments	[PM Appendix] p. 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. p. 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. p. 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? p. 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.	Comment noted. Response to the questions: 1) Are the auto and bus accessibility variables included in the regression models for 30-mile rings Response: No. SCAG didn't use concept of 30-mile ring, instead, two gravity-model type of accessibility indicators, with travel time as an impedance value, are calculated: auto accessibility is used as an independent variable in the VMT model, and local bus accessibility is used in the mode choice model. Zone-to-zone travel time used in the accessibility calculation reflects the traffic condition of the transportation network, which is very useful to this production-based modeling analysis. 2) In "Number of trips" model – is number of cars, included as an independent variable, the actual or predicted value? Response: To estimate model coefficients, the number of household vehicles is from NHTS data (actual). When using the model to estimate the number of trips or VMT, the number of vehicles is estimated from the "Auto Ownership Model" (predicted). 3) Were the elasticities for the SCAG NHTS study calculated at sample means, or for each observation and then averaged for the sample? Response: It is calculated for each observation and the result averaged. 4) 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. Response: It is 2035 Plan Scenario for the RTP/SCS.
109-27	Dave Simpson	Orange County	[SCS Background Appendix] p. 53, right col - Housing Options	Comment noted. The final SCS Background Documentation and

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		Council of Governments	and Mix: Define Larger-lot single family in text. p. 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. p. 71, right col - "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 housing." ["housing" misspelled] p. 71, right col - Plan Alternative (B). Define small lot single family in text. p. 71, right col - 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." p. 72, left col - "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…" p. 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. p. 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. p. 75, right col - "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.	Subregional Sustainable Communities Strategies Appendices have been updated to add clarifying language and reflect the comment, as appropriate.
109-28	Dave Simpson	Orange County Council of Governments	[SCS Background Appendix] p. 79, right col - "Subregional SCSs submitted by the Gateway Cities Council of Governments (GCCOG) and the Orange County Council of Governments (OCCOG) will be unchanged and integrated into the alternatives	Comment noted. The SCS Background Documentation Appendix was updated as part of the final RTP/SCS to include clarifying language and address comment.

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			(with possible revisions for Alternative C only).” p. 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? p. 80 - Alternative A. Add statement: “Gateway and Orange County COG subregions’ local input data will not be changed per their SCS delegation agreements.” p. 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.” p. 115, left col - Transit Zoning Code Santa Ana 2011. Is this a duplicate of the 2010 Santa Ana project?	
109-29	Dave Simpson	Orange County Council of Governments	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 56.
110-01	Mike Harmanos	Orange County Renewable Energy Society	We are a local chapter of the American Solar Energy Society. The Association of Governments had an Energy Working Group in 2006 and knowing that this process was going to take place, the plans of that group were put on temporary hold. The draft plan that was released in December mentions renewable energy one time on Page 82 of the report. I’m hoping that the energy working group can get reactivated, built back up again, and get the thoughts and ideas of grassroots organizations and elected officials working together. The organization that I represent has approximately 45 members in Orange County. We have people in the industry, people who are scientists, we have individuals who are just concerned about renewable energy and are	Comment noted. We look forward to working with the Orange County Renewable Energy Society in the future.

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			advocating its effective and intelligent use going into the next 20 years. I wanted to thank you for your hard work and also offer my organization's help in addressing some of the renewable energy infrastructure requirements that you will face going into 2035 and how renewable energy can be used, not in competition with an oil-based energy system, but as a back-up system, just as any decent business or organization would build contingency plans for back-up and concerns.	
111-01	Greg Nord	Orange County Transportation Authority	The draft RTP suggests that $127.2 billion of the approximately $219.5 billion regional shortfall can be addressed through actions at either the state or federal level with a $0.15 gas tax increase between 2017 and 2024. After that, the draft RTP assumes that the state or federal government would either replace the gas tax with an indexed mileage-based user fee of $0.05 per mile, beginning in 2025, or further increase fuel taxes to generate revenues equivalent to the mileage-based user fee. OCTA cannot support an increase in fees, including the introduction of a mileage-based user fee, until a comprehensive economic impact study is completed and presented to the OCTA Board of Directors (Board) for discussion. In addition, when considering support for any kind of a new user-based fee program, an emphasis must be placed on the need for a return-to-source criteria that guarantees funds generated within Orange County are reinvested in Orange County. Finally, there should also be a process for recognizing and rewarding areas that keep the transportation system in a state of good repair.	Comment noted. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources are less than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. An analysis of the economic impacts of the RTP is provided in the Economic and Job Creation Analysis of the 2012 RTP/SCS Appendix. We agree that return-to-source and rewarding areas that have made substantial strides to obtaining a state of good repair are critical items for any new revenue sources.
111-02	Greg Nord	Orange County Transportation Authority	The draft RTP identifies Phase I of the California High-Speed Rail Authority (CHSRA) Project as a potential solution for improving interregional and intercity ground transportation. As described in the RTP, the project is planned to connect San Francisco with Los Angeles and Anaheim. This also assumes improvements to increase speeds along the Los Angeles-San Diego-San Louis Obispo (LOSSAN) corridor and the Metrolink Antelope Valley Line. This project description is consistent with the draft CHSRA Business Plan, which OCTA has reviewed and provided comments on (attached). OCTA would like SCAG to take these comments into consideration as the RTP is refined for adoption in April. In summary, these comments focused on the following: OCTA supports the phased delivery approach, which includes early investment in the existing LOSSAN and Metrolink	Comment noted. The 2012 RTP/SCS supports early investments in the region's existing rail services and these investments are included in the Constrained and Strategic Plans. SCAG will be regularly providing high-speed and passenger rail updates through the Transportation Committee and Regional Council.

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			infrastructure; Rather than initially investing in the central segment, OCTA believes it is more prudent to begin implementation at the "bookends" of the system; Extending the implementation of Phase I by 13 years may jeopardize existing funding due to timely use criteria; The updated schedule should account for potential contingencies, and the associated potential cost increases should be addressed through contingency planning; The project's dependency on public funds could place CHSRA in direct competition for funding with existing transit service providers and local transportation agencies; It is questionable whether the funding plan truly complies with the requirements set out in Proposition 1A, specifically Section 2704.08(c)(2), items A through K; The operating assumption of "up to nine trains per hour" will likely result in an unnecessary level of service, and the projected operating surplus of $1 billion per year is too optimistic; The $171 billion alternative investment in airports and roadways does not account for the airport and roadway investments that will be required both with and without the high-speed rail project. In addition, OCTA recommends that SCAG provide regular updates to the Transportation Committee and Regional Council regarding the CHSRA business plan, financial status, implementation progress, and any changes in assumptions by the CHSRA; particularly with respect to the status of the memorandum of understanding that better defines CHSRA's commitments to near-term speed improvements for the LOSSAN and Metrolink services.	
111-03	Greg Nord	Orange County Transportation Authority	The draft RTP includes the implementation of a regional high-occupancy toll (HOT) lane network. This network appears to utilize existing and planned high-occupancy vehicle lanes to generate new revenues by selling excess capacity to single-occupancy drivers. The proposed regional HOT lane network assumes that Orange County would include HOT lanes on Interstate 5 (I-5) between the San Diego County border and the southern end of State Route 73 (SR-73); along I-405 between the northern end of SR-73 and the Los Angeles County border; and along State Route 91 (SR-91) extending the Express Lanes west to the Los Angeles County border. On December 12, 2011, the OCTA Board approved the Express Lane Planning and Implementation Principles (attached). OCTA requests that these	Comment noted. The OCTA Express Lane Planning and Implementation Principles will be incorporated into the assumptions for the applicable segments of the regional HOT lane network. The proposed regional HOT lane network is a product of the Express Travel Choices study of which OCTA staff plays an active role. In addition, on December 12, 2011, the OCTA Board has directed staff to participate of the Express Travel Choices Phase II study and approved OCTA's share of local match for the study, which will further evaluate implementation issues. We also recognize that SCAG is not the implementing agency for the proposed HOT lanes and will continue to work in a collaborative manner with our partners.

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			principles be incorporated into the assumptions for segments of the regional HOT lane network that are within Orange County. Furthemore, the proposed HOT lane improvements to I-5, and SR-91 should be subject to further study to evaluate right-of-way impacts, community issues, and overall feasibility, prior to inclusion in the constrained plan.	
111-04	Greg Nord	Orange County Transportation Authority	Due to continuing growth at the ports of Long Beach and Los Angeles, and increasing congestion on freeways throughout the SCAG region, the draft RTP highlights the need for a zero emission East-West Freight Corridor. The corridor would aid the movement of goods between the ports and warehousing facilities located inland. This reflects the findings from the Comprehensive Regional Goods Movement Plan and Implementation Strategy. Several other corridors were examined, including the SR-91, through Orange County and Interstate 10. After considerable study, the State Route 60 corridor was selected for further study based on its proximity to current and future markets, feasibility and right-of-way constraints, future truck volumes, and potential for reducing truck-involved accidents. The SR-91 was not selected primarily due to right-of-way constraints throughout the corridor, and lack of good access to warehousing locations. OCTA supports the East-West Corridor as it appears in the Draft 2012 RTP. OCTA believes that the findings from the Comprehensive Regional Goods Movement Plan and Implementation Strategy are accurate, and OCTA encourages SCAG to build on the progress of the East-West Corridor based on these findings.	Comment noted.
111-05	Greg Nord	Orange County Transportation Authority	SCAG proposes a number of other investments within the draft RTP that affect Orange County, and go beyond the Long-Range Transportation Plan (LRTP). OCTA recognizes that it is within SCAG's purview to plan for regional strategies that enhance transportation, such as the ones discussed below. It should be noted that OCTA is committed to delivering the projects within the LRTP. OCTA will only consider additional investments after revenues are identified to account for these commitments. The regional strategies identified by SCAG do not have clear funding mechanisms, and it must be made clear that their inclusion in the RTP does not constitute a commitment to fund and/or implement the improvements. Examples of regional strategies include the congestion management projects identified by the	Comment noted.

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			California Department of Transportation. In Orange County, these corridors include State Route 57, State Route 22, Interstate 605, SR-91, and I-405. The improvements consist of relatively low-cost operational improvements such as ramp metering, auxilary lanes, and other ramp and interchange enhancements. These are in addition to what was already submitted to SCAG by the county transportation commissions (CTCs) such as OCTA, and rely on funding sources beyond those identified in the LRTP. The draft RTP also proposes additional transit enhancements throughout the region. The key transit investments that go beyond what the CTCs have committed include expanding local bus service, additional bus rapid transit, and new express bus service. These improvements are not specified in the draft RTP, but the additional cost to the region for these services is estimated at about $2.6 billion. These additional costs are covered by SCAG's assumed transportation funding levels, which are beyond the available and committed resources identified in the LRTP. An additional emphasis is also placed on walking and bicycling, which is referred to as "active transportation." The draft RTP proposes to increase the regional investment in active transportation by about $4.5 billion. When the committed investments submitted by the CTCs are accounted for, the total active transportation investment is approximately $6 billion for the SCAG region. Again, this additional investment is over and above resources identified in the LRTP, and the improvements are addressed only at the regional level.	
111-06	Greg Nord	Orange County Transportation Authority	Throughout the draft RTP and PEIR, there are references to transportation projects inducing growth and influencing land-use development and demand. One such instance is on page 80 of the draft RTP, which states the following: "Transportation projects including new and expanded infrastructure are necessary to improve travel time and can enhance quality of life for those traveling throughout the region. However, these projects also have the potential to induce population growth in certain areas of the region. Although SCAG does not anticipate that the RTP would affect the total growth in population in the region, the RTP has the ability to affect the distribution of that growth." These types of statements are misleading for a number of reasons. For example, the excerpt quoted above	Comment noted. The reference to induced growth has been removed in the Final RTP/SCS.

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			states that the "RTP has the ability to affect the distribution of growth." This can be understood to imply that SCAG has the ability to influence growth through the development of the RTP. OCTA trusts that this is not SCAG's intent. OCTA recommends that such references be clarified, as land use decisions are within the purview of local agencies. Moreover, and more importantly, statements such as the above excerpt imply a lack of coordination between land-use and transportation agencies, especially in the light of the recent efforts to develop the Sustainable Communities Strategies at the subregional and regional levels. There should be an emphasis in the RTP on the fact that land-use and transportation agencies are coordinating better now than ever before. OCTA recommends that SCAG clarify the negative implication of the statements regarding induced growth, and highlight the elevated level of coordination occurring today.	
111-07	Greg Nord	Orange County Transportation Authority	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 59.
112-01	Greg Nord	Orange County Transportation Authority	OCTA would like to request modifications to the project list that have been submitted to SCAG staff through the standard RTP long-range project list modification and FTIP database update processes. Major project modifications include: ORA55241 ORA020115 2A0705 2H01143 2M0730 2H0703 2H0706 2T01135 2120010 2TR0701 2L206 2TR1001 Major project additions include: ORA030605 Additional comments have also been submitted via email regarding the following projects: 2M0733 (extend the limits to SR-91) 550 (only model the HOV ramp in the Strategic Plan) Furthermore, the comments submitted on the Orange County fact sheet, which was used for SCAG's RTP workshops/outreach, should also be reflected in the Final RTP and PEIR. Finally, please modify the project desription for HSRT0701 to read as follows: ENVIRONMENTAL CLEARANCE AND ADVANCED CONCEPTUAL DESIGN OF THE CALIFORNIA HIGH SPEED RAIL AUTHORITY, HIGH SPEED RAIL PROJECT FROM SAN FRANCISCO TO LOS ANGELES AND ANAHEIM.	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
113-01	Carolyn Mamaradlo	Orange County Transportation Authority	With regard to Page 6 of the Draft RTP Active Transportation chapter: Please note that the latest OCTA bikeways plan is the 2009 Commuter Bikeways Strategic Plan. This plan is expected to be updated for 2014. On Jan. 23, 2012, the OCTA Board of	Comment noted. The title of the OCTA bikeway plan has been corrected and the added description of the Orange County Bikeways program has been added.

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			Directors directed staff to move forward with the Orange County Bikeways program, a coordinated effort between local agencies and OCTA entailing (1) strategic corridor planning, (2) the development of detailed implementation plans, and (3) construction of high-priority projects. The goal of this program is to take advantage of grant funding opportunities by developing shelf-ready projects along regional bikeway corridors.	
114-01	Michael Kodama	Orangeline Development Authority	On January 11, 2012, the Orangeline Development Authority Board of Directors voted to communicate to you its support for including the OLDA Northern Corridor in the Constrained Projects List for the 2012 Regional Transportation Plan. This addition provides connectivity ncessary for the success of the OLDA Southern Corridor (West Santa Ana branch), which is in the constrained list. The OLDA Northern Corridor coincides with much of the list of improvements being studied by Metro as the Antelope Valley Line Infrastructure Improvement Strategic Plan and the currently planned alignment of the California High Speed Rail project. The likelihood that funds would be available for these set of Improvements are enhanced by the Memorandum of Understanding being negotiated for use of the Proposition 1A (High Speed Rail) funds.	Comment noted.
114-02	Michael Kodama	Orangeline Development Authority	Recent events and planning efforts have focused attention on the OLDA Northern Corridor from Downtown Los Angeles to Santa Clarita. Based upon these efforts, OLDA would like to suggest that the OLDA Northern Corridor be included in the constrained plan (Antelope Valley Line). Specific planning efforts in the corridor include; Bob Hope Airport - The Burbank Glendale Pasadena Airport Authority and OLDA are conducting a $5.4 million Ground Access Study. The grant provides planning and construction funds for improvements on the Antelope Valley Line and has become a catalyst for OLDA Northern Corridor improvements. The study focuses on multimodal transportation improvements linking to the regional system, including the feasibility of a new North Station on the Antelope Valley Line at Hollywood Way and San Fernando Road. The study has led to additional planning efforts that can lead to significant improvements linking Santa Clarita to Downtown Los Angeles. Further, the Airport is going to break ground on a Regional Intermodal Transportation Center. More details are in	Comment noted. For a project to be considered for inclusion in the constrained RTP, the project must be clearly defined, it must have reasonably available funding for implementation, including construction and right of way acquisition, and it must have the concurrence of the relevant county transportation commission/s. As discussed with the Orangeline Development Authority, the Northern Corridor could be considered for inclusion in to the future RTP amendments once these conditions are satisfactorily met. However, the Orangeline section of the Passenger Rail Appendix will reflect the developments brought up in this comment.

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			the SCAG RTP appendix entitled "Aviation and Airport Ground Access."	
114-03	Michael Kodama	Orangeline Development Authority	Antelope Valley Line Infrastructure Improvement Strategic Plan - Metro is conducting a study to upgrade the Antelope Valley Line. The 75 mile corridor runs at-grade from Los Angeles Union Station to Lancaster and includes plans for several capital improvements. The Antelope Valley Line Study is providing the plan to create a shared corridor involving not only current Metrolink service but also part of the High Speed Train system. Results of this study should be available in March 2012 and are expected to include recommendations that meet many of the OLDA goals and objectives.	Comment noted. The RTP discusses the Antelope Valley Line Study and includes capital improvements to it in the Constrained Plan.
114-04	Michael Kodama	Orangeline Development Authority	Memorandum of Understanding - In January, 2012, a MOU has been developed between the California High Speed Rail Authority, SCAG, Metro, SCRRA and many other local transportation agencies. The MOU addresses advance investment of up to $1 billion in Southern California as part of the CHSRA's commitment to a "Blended Approach" to the construction of the high speed train system in California. As you are aware, this MOU is a significant document that allows for this work to now be included in the Constrained portion of the Draft RTP. This can lead to the planning and funding necessary to include OLDA's Northern Corridor in the Constrained portion of the RTP. Again, on behalf of the OLDA Board, we would like you to work with us on how we can include the OLDA Northern Corridor in the Constrained Project list for the 2012 RTP.	Comment noted.
115-01	Paul Little	Pasadena Chamber of Commerce	While we appreciate that a regional approach to traffic management, transportation and goods movement we also want to be sure that plans and implementations are truly regional and economics and impacts to local economies are given due consideration.	Comment noted. SCAG engaged a team of highly regarded economic experts and they have concluded the 2012-2035 RTP provides a significant economic benefit to the region's economy. Please see Economic and Job Creation Appendix as part of the Final RTP/SCS for more information.
115-02	Paul Little	Pasadena Chamber of Commerce	For example, we would be very concerned about user-based fee proposals to fund transportation projects. For us, we could not support any program or plan that would put the Pasadena area at a competitive disadvantage economically. Traffic, transportation, goods movement and customers need to be able to access Pasadena as easily, simply and cost-effectively as our neighbors in the region.	Comment noted. We agree that all funding proposals should critically consider associated impacts, including whether it would result in the SCAG region or its member entities being at an economic disadvantage. The mileage-based user fee included in the RTP financial plan assumes statewide and national implementation.
115-03	Paul Little	Pasadena Chamber of	Plans for programs that will charge drivers a fee to get to Pasadena should be implemented region-wide, not piecemeal,	Comment noted. We agree. The financial plan does not assume any fee imposed exclusively to the City of Pasadena nor limited

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		Commerce	and certainly not in the San Gabriel Valley first. If, for example, congestion pricing schemes or toll roads are proposed, we would want those implemented region-wide, not in a way that puts our area at a disadvantage economically as increased costs to travel to, through or past Pasadena that do not exist in other places, put Pasadena at a competitive disadvantage compared to those places in the area that would not see those same programs implemented and those additional costs imposed.	to San Gabriel Valley residents or businesses. Ensuring that the SCAG region and its member entities are not at an economic disadvantage are critical considerations used in the development of all funding proposals included in the RTP.
115-04	Paul Little	Pasadena Chamber of Commerce	Likewise, and program or plan to assess fees to mitigate development impacts need to be approved by the local government and funds generated need to be used by those local governments to reduce impacts in their area and existing local fees should exempt businesses within those jurisdictions from any additional costs.	Comment noted. The financial plan does not include any revenues nor assume the implementation of development impacts fees for the City of Pasadena. The Transportation Finance Appendix provides a detailed explanation of all revenue sources and summarized the transportation expenditures included in the RTP.
115-05	Paul Little	Pasadena Chamber of Commerce	We are also concerned that an agency with little understanding of the Pasadena economy, our local business community or community needs is proscribing programs, mitigation and measures that may be inappropriate or unworkable in our local jurisdictions. It is certainly prudent for SCAG, through the RTP, to set goals for everything from pollutants in the air to the time it should take to travel between cities in the region, but SCAG should not be determining what programs will achieve those goals, not what local costs will be able to achieve them.	Comment noted. The RTP/SCS is not intended to proscribe any programs, mitigation or other measures for the City of Pasadena. Local agencies retain full discretion whether to implement any of the programs and measures contained in the RTP/SCS.
115-06	Paul Little	Pasadena Chamber of Commerce	We also appreciate the linking of land use policies with transportation planning, however we do not see how many local jurisdictions could achieve the goals, especially given the elimination of redevelopment agencies by the State of California. Quite simply, there is no mechanism for localities to support development of any kind, especially not more dense development in our downtowns that would like require consolidation of properties. How is that to be accomplished when there is no mechanism to capitalize such endeavors?	Comment noted. The elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects intended to support the policies in the 2012 RTP/SCS. SCAG will continue to identify funding resources for local governments pursuing such policies.
115-07	Paul Little	Pasadena Chamber of Commerce	In fact, we are very concerned that the funding mechanisms identified to finance projects will be very short of anticipated levels, and that some of these mechanisms may never be available as they are not currently implemented in California.	Comment noted. SCAG is working to secure incentives for local governments for SCS implementation including additional funding for SCAG's Local Sustainability Planning Assistance Program (e.g., Compass Blueprint, Green Region) and Strategic Growth Council grants. We recognize that the elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects intended to support the policies in the 2012 RTP/SCS. SCAG will

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				continue to identify funding resources for local governments pursuing such policies.
115-08	Paul Little	Pasadena Chamber of Commerce	We are also concerned that, while it is important to move goods, vehicles and persons easily through the region, we should be very mindful of impacts to local streets and local economies. Putting in a freeway does no good if the resulting overflow traffic stifles local streets and strangles local business districts.	Comment noted.
115-09	Paul Little	Pasadena Chamber of Commerce	Finally, the Pasadena Chamber of Commerce cannot stress enough the importance of our local economies. Transportation planning, like every other government endeavor, needs to fully, accurately and appropriately take impacts to the local, regional and state economy into consideration. The best transportation plan imaginable is worthless if it stifles job and economic growth and puts our region, and its cities at a competitive disadvantage.	Comment noted. SCAG engaged a team of highly regarded economic experts and they have concluded that the 2012-2035 RTP provides a significant economic benefit to the region's economy. Please see Economic and Job Creation Analysis Appendix for more information.
116-01	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Dear President O'Connor and Southern California Association of Governments Regional Council Members: The undersigned appreciate the dedication and efforts of the staff at Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the recommendations in the plan that moves the region towards an improved transportation system while improving public health and air quality. The 2012 RTP/SCS includes many smart growth strategies that will increase mobility, public health and environmental health standards. As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to: · Increase investment in active transportation strategies. · Acknowledge that a regional zero emission freight system is needed in the region. · Discuss gentrification issues as part of Environmental Justice. · Monitor premature mortality due to PM2.5. Though SCAG has shown commitment to improving the region's mobility, economy and sustainability by including public health analysis in transportation planning policies, more can still be done to improve air quality, increase equity and improve our goods movement system. The SCAG region faces immense public health and environmental challenges, and the RTP/SCS must be enhanced to address these issues. The SCAG region continues to	Comment noted. 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 and/or near-zero emission freight system. The strategic RTP/SCS includes a recommendation to continue ongoing work with railroads, air quality management agencies and other stakeholders to reach our goal of a zero and/or near-zero emissions rail system. Data and analysis included in the Environmental Justice Appendix does not account for Plan improvements in vehicle technology particularly for truck only corridors. These corridors in the Plan are exclusively for zero and/or near-zero emission vehicles. Furthermore, the Program Environmental Impact Report (PEIR) accompanying the RTP/SCS includes mitigation measures that would reduce impacts associated with health risk within 500 feet of freeways and high-traffic volume roadways to less than significant. Analysis included in the Appendix also does not account for emissions improvements through the implementation of these mitigation measures. As such, emissions and exposure analysis shown in this Appendix is abundantly conservative and demonstrates worst-case scenario

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			have the worst air quality in the nation and contains "14 non-attainment and maintenance areas in four air basins". Additionally, SCAG recognizes that 25% to 27% of the population "within the freeway adjacent areas are projected to see increases in their emission exposures to CO and PM". According to Figure 46 in the Environmental Justice Appendix, close to 60% of the population residing within 500 feet from the buffer area are Hispanic and in Quintile 1 (The Lowest Income Household). The issues of air pollution are even more acute in the SCAG region given the rampant prevalence of diesel equipment used in the freight industry. Residents in close proximity to highways, particularly those with high levels of diesel trucks, will experience increased rates of cardiovascular and respiratory disease, premature mortality, increased lung cancer incidence, decreased life expectancy, reproductive health problems, and increased asthma symptoms	outcomes. If these emissions improvements had been accounted for, we believe the analysis would show little or no areas with worsened emissions ("hot spots") associated with the Plan. Moreover, the currently available data on emissions and on the distribution of households and population is imprecise such that the overlay with emissions and EJ populations will tend to overstate any potential impacts. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with the mitigation identified and to be implemented as part of the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. The trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering.
116-02	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	. As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to: · Acknowledge that a regional zero emission freight system is needed in the region. ·	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. The 2012 RTP includes an Environmental Action Plan that will lead to the deployment of zero emission technologies in the timeframe necessary to meet federal requirements.
116-03	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to: Discuss gentrification issues as part of Environmental Justice.	Comment noted. While the EJ analysis in the Draft RTP did show some locations with emissions increases, this analysis did not account for plan improvements in vehicle technology particularly for truck only corridors. These corridors in the plan are exclusively for zero and near-zero emission vehicles. If these emission improvements had been accounted for we believe the analysis would show no hot spots associated with the plan. As such, the emissions and exposure analysis shown in the Draft EJ Appendix is abundantly conservative and demonstrating worst-case scenario outcomes. Even in the event that hot spots remain after accounting for vehicle

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				technology improvements, there is no reliable way to conclude hot spots would overlay with EJ communities. Neither the available data on emissions nor on distribution of households and population is at a precise enough level of geography to show where they would intersect. Given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with mitigation identified in the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. The trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering. SCAG will also include potential resources related to gentrification and displacement in the final EJ analysis.
116-04	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	As advocates for improving public health and equity, we are encouraged to see SCAG's recommendations to: · Monitor premature mortality due to PM2.5. Though SCAG has shown commitment to improving the region's mobility, economy and sustainability by including public health analysis in transportation planning policies, more can still be done to improve air quality, increase equity and improve our goods movement system. The SCAG region faces immense public health and environmental challenges, and the RTP/SCS must be enhanced to address these issues. The SCAG region continues to have the worst air quality in the nation and contains "14 non-attainment and maintenance areas in four air basins". Additionally, SCAG recognizes that 25% to 27% of the population "within the freeway adjacent areas are projected to see increases in their emission exposures to CO and PM". According to Figure 46 in the Environmental Justice Appendix, close to 60% of the population residing within 500 feet from the buffer area are Hispanic and in Quintile 1 (The Lowest Income Household). The issues of air pollution are even more acute in the SCAG region given the rampant prevalence of diesel	Comment noted. 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/near aero-emission freight system. The strategic RTP/SCS includes a recommendation to continue ongoing work with railroads, air quality management agencies and other stakeholders to reach our goal of a zero or near-zero emissions rail system.

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			equipment used in the freight industry. Residents in close proximity to highways, particularly those with high levels of diesel trucks, will experience increased rates of cardiovascular and respiratory disease, premature mortality, increased lung cancer incidence, decreased life expectancy, reproductive health problems, and increased asthma symptoms.	
116-05	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	While we recognize that the goods movement sector is an economic driving force in the region, we cannot sit by idly and allow the immense damage to the health of our most vulnerable communities persist. Given these challenges, we recommend several improvements that must be made to improve the RTP/SCS.	Comment noted.
116-06	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	The RTP/SCS Must Do More To Promote Public Health Protections, Active Transportation and Equity. The RTP/SCS is the blueprint for years to come. As such, it must be designed to promote public health through choosing better transportation alternatives and making sure we spread the benefits of these investments to all residents in the region, regardless of race, income, or other social status. Moreover, we must make sure we minimize exposure to environmental harms.	Comment noted. It should be noted from the EJ analysis results in the report that while some locations are identified with emissions increases, this analysis did not account for plan improvements in vehicle technology particularly for truck only corridors. These corridors in the plan are exclusively for zero and near-zero emission vehicles. If these emission improvements had been accounted for we believe the analysis would show no hot spots associated with the plan. As such, the emissions and exposure analysis shown in the EJ Appendix is abundantly conservative and demonstrating worst-case scenario outcomes. Even in the event that hot spots remain after accounting for vehicle technology improvements, there is no reliable way to conclude hot spots would overlay with EJ communities. Neither the available data on emissions nor on distribution of households and population is at a precise enough level of geography to show where they would intersect. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with mitigation identified in the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level. As to existing population distribution and future growth along the Freeway 500 feet buffer areas, It should be noted that currently the level of emissions near these facilities is substantially higher than in the region as a whole, and in 2035 these areas still will have higher emissions than the

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				region as a whole. SCAG is very much aware of the competing interests between near roadway exposures and health benefits from TODs as a result of active transportation opportunity. SCAG encourages researches and studies to further explore feasible mitigation measures. However, regionwide air quality is improving with the plan comparing to either today's condition or future year without the plan. While regional emissions overall decrease between now and 2035, the rate of decrease near freeways and high volume roads is even greater. The RTP/SCS does result in an increase in population in these locations, and as such health risk is higher for these individuals than if they were not in the buffer area. As such, subsequent project level analysis and mitigation should be cognizant of on-going health concerns. Nevertheless, the plan as a whole shows benefits for emissions exposure and decreased levels of risk in areas near freeways.
116-07	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	II. The RTP/SCS Must Invest and Include Healthy and Equitable Policies. Implementing this recommendation requires addressing the following critical public health issues: A. Mitigate PM and CO exposure in high quality transit areas. The 2012 RTP/SCS will redirect 51% of new housing near High Quality Transit Areas (HQTA) providing an opportunity for healthy communities. Redirecting the growth of new housing closer to busy roads and freeways could violate the California Air Resources Board's recommended 500 feet freeway buffer, and potentially increase CO and PM exposure and noise impacts. SCAG has acknowledged that 25% to 27% households living within freeway adjacent areas will see increases in their emission exposure to CO and PM. In addition to monitoring these areas for PM and CO, we recommend that SCAG also project and map out the areas that may be impacted as a result of the redirected growth up to the year 2035. We also recommend for SCAG to include current mitigation strategies in the EJ Toolkit and work with the local communities, health advocates and stakeholders to continue developing policies that will be included as part of the mitigation strategies for HQTA.	Comment noted. Data and analysis included in the Environmental Justice Appendix does not account for Plan improvements in vehicle technology particularly for truck only corridors. These corridors in the Plan are exclusively for zero and/or near-zero emission vehicles. Furthermore, the Program Environmental Impact Report (PEIR) accompanying the RTP/SCS includes mitigation measures that would reduce impacts associated with health risk within 500 feet of freeways and high-traffic volume roadways to less than significant. Analysis included in the Appendix also does not account for emissions improvements through the implementation of these mitigation measures. As such, emissions and exposure analysis shown in this Appendix is abundantly conservative and demonstrates worst-case scenario outcomes. If these emissions improvements had been accounted for, we believe the analysis would show little or no areas with worsened emissions ("hot spots") associated with the Plan. Moreover, the currently available data on emissions and on the distribution of households and population is imprecise such that the overlay with emissions and EJ populations will tend to overstate any potential impacts. Nevertheless, given on-going concerns and evolving information on health impacts, SCAG encourages project sponsors to be cognizant of any potential health risks in project design and delivery. Consistent with the mitigation

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				identified and to be implemented as part of the proposed final PEIR, SCAG will assist in disseminating information and identifying effective strategies to reduce risk at the project level. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. The trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering. SCAG has also included potential resources related to gentrification and displacement in the Final EJ Appendix.
116-08	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	B. Mitigate highway noise areas in communities of concern. Highway noise areas are also disproportionate to environmental justice communities with 22% of the affected population residing within roadway noise areas and 14% of the households below the poverty line. Noise impacts have been associated with hearing impairment, hypertension and ischemic heart disease annoyance and sleep disturbance. Further noise impact mitigation studies should be utilized in future 2012 RTP/SCS plans.	Comment noted. The Environmental Justice Mitigation Toolbox includes recommended mitigation for noise impacts in environmental justice communities. We agree that further research is needed to better understand highway noise impacts, particularly in communities of concern. SCAG looks forward to working with the Center for Community Action and Environmental Justice to identify mitigation studies that would be appropriate for future RTP/SCS plans.
116-09	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	C. Monitor and develop tools to avoid gentrification and displacement in TODs. SCAG's current analysis of 125 HQTA around rail stations found that the demographics of HQTA/TOC are changing. Poverty rates are declining in these areas when compared to the rest of the region. These results show that displacement and gentrification may be occurring in these areas. As such, gentrification should be acknowledged and policies need to be put in place to avoid this from happening. In addition to tracking the 125 rail stations, SCAG should: 1. Track commute time by race and income in Communities of Concern (COCs) and compare it to the region. 2. Set a baseline for jobs-housing fit by taking a "snap shot" of 4-to-5-mile buffer zone around major job centers, and compare the wages provided by those jobs to cost of housing within the buffer zone to see if there is a good jobs-housing fit. Continuing to monitor the jobs/housing fit over successive RTP/SCSs will be an important tool for transportation planning in rural, urban and suburban areas. 3. Use the Compass Blueprint Program to advance a	Comment noted. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. The trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering.

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			policy toolkit that highlights and recommends anti-displacement and anti-gentrification policy options in TOD areas, as an eligible subject for a Compass Blueprint grant proposal.	
116-10	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	III. The RTP/SCS Must Ensure That the Region has a Complete Network of Transportation Strategies that Connect Travelers to a Wider Range of Transportation Options. This entails implementation of the following recommendations: A. Increase investment in active transportation. In order to achieve true walkable and healthy communities we recommend for SCAG to increase its investments in Active Transportation strategies beyond the $6 billion currently recommended.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
116-11	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	B. Increase investment in public transportation. Prioritize investment in bus rapid transit and taking existing infrastructure to include bus-only lanes instead of expanding highway to accommodate for additional capacity.	Comment noted. The 2012 RTP/SCS contains $55.0 billion for transit capital, $51.8 billion for rail capital, and $139.3 in transit operations funding. 46.9% of all investment in this plan is for transit or rail.
116-12	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	C. Access, mobility and safety. In order to better connect the region that depends on non-motorized modes of transportation, first-mile/last-mile strategies should also include close-the-gap strategies that integrate active modes of transportation to allow for accessibility to employment and services. To better do this, SCAG should identify geographic areas with high concentrations of communities of concern and track their transportation access, cost, mobility, rent, and gentrification and displacement patterns (using the seven indicators to track early signs of displacement or gentrification). The data can be used in future RTP/SCS and determine where close-the-gap strategies would best serve the region and address any adverse impacts that transportation projects can cause to communities of concern. SCAG should also use the data to determine what communities are underserved by transportation projects and connect those underserved	Comment noted.

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			communities to high opportunity areas.	
116-13	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	IV. SCAG Must Support Federal Policies That Benefit Active Transportation. Given the current state of the federal transportation bill and efforts to strip dedicated funding from MAP-21 in the Senate and the House American Energy and Infrastructure Jobs Act in the House, we are concerned that expected federal revenues for bicycle and pedestrian enhancements may not materialize.	Comment noted.
116-14	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	To this end we request that SCAG fully support an amendment offered by Senator Lautenberg in the EPW Committee to ensure that total funds available in the "additional activities" reserve fund in MAP-21 for Recreational Trails, Safe Routes to School, and bicycle and pedestrian investments are equal to those currently in SAFETEA-LU. Additionally, this amendment would ensure that regions within states are able to have direct and first access to these funds so that cities throughout the SCAG region are able to directly apply for and receive funding for important bicycle and pedestrian projects. As the Senate bill progresses to the floor there will be opportunities for Senator Boxer to incorporate these provisions into the final bill and it is important for SCAG to make clear it supports them.	Comment noted.
116-15	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	V. The Freight Strategies in the RTP/SCS Must Be Improved. We remain deeply concerned about the freight elements of the RTP/SCS. While the plan acknowledges the need to move to zero emissions technologies, it provides little substance on how it will actually happen.	Comment noted.
116-16	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	The RTP must be more rigorous. To support this, we suggest the following improvements to the freight elements of the plan. A. The RTP/SCS must actually require creation of a zero-emission truck and freight goods movement for the region. Several issues must be addressed in the 2012 RTP/SCS before it is adopted with regard to how freight is moved through the year 2035. Goods movement strategies must ensure that the South Coast Air Basin meet federal air quality standards set forth in the Clean Air Act.	Comment noted. SCAG does not have the authority to mandate such policies. However, the regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission/near-zero-emission trucks. This system offers the opportunity to incentivize the adoption of clean, zero-emission technologies for regional freight movement. SCAG continues to support efforts by regional partners and stakeholders to address goods movement emissions and impacts.
116-17	Patty Ochoa	Physicians for Social Responsibility,	Currently, the plan provides little detail on this issue, including how black box reductions will be achieved from the substantial portion of emissions from freight.	Comment noted.

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		and Other Organizations (collaborative letter)		
116-18	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	While we agree with the many experts who "question the long-term viability of continued reliance on fossil fuels," the RTP/SCS lacks details on how best to actually achieve this goal	Comment noted.
116-19	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	The "uncertainty of a petroleum-based future" needs to be at the forefront of the 2012 RTP/SCS where any expansion plans that increase a petroleum-based roadway system and raise Vehicle Miles Travel (VMT) must be curtailed.	Comment noted.
116-20	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	The RTP/SCS needs to do more than just put words on paper about the need for this system. Future projects must be required to incorporate these technologies or they should not be built.	Comment noted. SCAG does not have the authority to mandate such policies. However, the regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. This system offers the opportunity to incentivize the adoption of clean, zero-emission technologies for regional freight movement. SCAG continues to support efforts by regional partners and stakeholders to address goods movement emissions and impacts.
116-21	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Financing these cleaner technologies is an important consideration for SCAG. Ensuring that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies should be a central component of the strategy. For these reasons, we recommend that SCAG consider including the following funding strategies: 1. Develop a clear assessment of various financing options including various models of public-private partnerships that could make zero-emission technology options possible. Recommend a $30 per twenty-foot container fee for moving either into or out of the ports. This strategy could generate as much as $441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports	Comment noted. SCAG will work closely with regional partners and stakeholders to identify potential funding mechanisms as appropriate.

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116-22	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Use currently available clean truck technology and incentivize it through funding and or by way of preferential access lanes at terminals	Comment noted.
116-23	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Reinstitute the diesel truck fee to incentivize clean, alternative fuel trucks.	Comment noted.
116-24	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	B. The RTP/SCS must implement near-term solutions to reduce greenhouse gas emissions from freight. We are deeply concerned that the projected increase in freight volumes and traffic will undermine the gains of the 2012 RTP/SCS in other areas. In particular, CO2 emissions from trucks would increase at least 30% by 2023 and at least 60% by 2035.	Comment noted. The 2012 RTP GM environmental strategy establishes a plan to advance GM technology in the region. Many of these technologies will have the ability to reduce GHG.
116-25	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Even more dramatically, CO2 emissions from rail would increase at least 50% by 2023 and at least 123% by 2035.	Comment noted. The 2012 RTP GM environmental strategy establishes a plan to advance GM technology in the region. Many of these technologies will have the ability to reduce GHG.
116-26	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Given that "This RTP Goods Movement Environmental Strategy was developed to address community concerns, federal attainment requirements, and climate change issues," it is problematic that near-term solutions are not more fully articulated.	Comment noted. The 2012 RTP delineates a series of steps and decision points to move the region to the objective of a zero emissions freight transportation system. Further clarification has been provided about near-term solutions as appropriate.
116-27	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations	Near-term strategies to clean up goods movement must be fully integrated into the 2012 RTP/SCS.	Comment noted. Further clarification has been provided about near-term solutions as appropriate.

ID	Name	Affiliation	Comment	Response
		(collaborative letter)		
116-28	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	We would like to work with you before the final version of the 2012 RTP/SCS to resolve this deficiency.	Comment noted. SCAG has provided significant opportunity for input to the 2012 RTP. This included, but was not limited to, the SCAG RTP website, policy and committee meetings, a series of eighteen public workshops held during Summer 2011, and eighteen additional workshops and public hearings held following the release of the Draft 2012 RTP. These workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders. (Please see the SCAG 2012 RTP Public Participation Plan at http://www.scagrtp.net/content?c=06.) However, SCAG will continue to work with partners and stakeholders following the adoption of the 2012 RTP.
116-29	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Indeed as stated "For trucks, an aggressive program to bring more currently available, clean fuel trucks and hybrid trucks into service represents the best near-term strategy." Yet no such program is identified for either trucks or rail.	Comment noted.
116-30	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	The ports of Los Angeles and Long Beach have left a gaping hole in clean air planning by not establishing targets and reduction plans for greenhouse gases (GHGs).	Comment noted.
116-31	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	SCAG and the 2012 RTP/SCS should demand that the Clean Air Action Plan be augmented with GHG reduction plans. Both ports have in the past promised to have such plans but neither has released one.	Comment noted.
116-32	Patty Ochoa	Physicians for Social Responsibility,	Such plans should complement and accelerate SCAG's vision for increased efficiencies and the deployment of cleaner technologies.	Comment noted.

ID	Name	Affiliation	Comment	Response
		and Other Organizations (collaborative letter)		
116-33	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	While we commend the steps to evaluate and seek funding for longer-term zero and near-zero emissions technologies, the severity of the pollution and congestion from freight activities merits additional attention in the near-term.	Comment noted. The 2012 RTP delineates a series of steps and decision points to move the region to the objective of a zero emissions/near-zero-emissions freight transportation system. Further clarification has been provided on near-term technologies as appropriate.
116-34	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	And while the 2012 RTP/SCS rightly considers heavy-duty trucks and rail emissions, it would be worth devising a set of strategies that account for the differences among local freight service and that of port origin/destination.	Comment noted. SCAG concurs. Our analysis to date looks at how the operational requirements of truck and rail as applied to different markets would impact their technology needs.
116-35	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Similarly, the sector of medium duty trucks may be targeted for technology improvements, given that it is the sector's 2nd largest emitter of NOx	Comment noted.
116-36	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	In the section On-Dock/Near-Dock Rail Capacity Enhancements, the 2012 RTP/SCS appropriately expresses preference for on-dock rail "By allowing more on-dock rail, truck traffic between the San Pedro Bay Ports and distant rail yards can be reduced. Use of on-dock rail eliminates truck vehicle miles of travel (VMT) and associated emissions"	Comment noted.
116-37	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	SCAG should demand a sequencing of projects that maximizes on-dock rail and that reduces constraints on the expansion of on-dock capacity in advance of projects that expand off-dock capacity. Without appropriate sequencing, efficiencies could be lost.	Comment noted. SCAG works closely with partner agencies, including the San Pedro Bay Ports, to identify and support implementation of regionally-beneficial projects as appropriate. However, SCAG does not determine the sequencing of the implementation of projects at the San Pedro Bay Ports.

ID	Name	Affiliation	Comment	Response
116-38	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	VI. The RTP/SCS Must Remove the East-West Corridor Route Project. Recommending to build an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the region and particularly for local communities of concern (COC).	Comment noted. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission/near-zero-emissions trucks. Specific housing, health, and demographic impacts from the East-West Freight Corridor alignment identified as part of the 2012 RTP would be analyzed in more detail through an Environmental Impact Report (EIR). SCAG also continues to support efforts by regional partners and stakeholders to address goods movement emissions and impacts on communities.
116-39	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Additionally, if the east-west corridor project goes forward, an increase in truck traffic per day (from 58,000-78,000) could increase noise pollution and air pollution	Comment noted. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission/near-zero-emissions trucks. Further, specific noise and air quality impacts from the East-West Freight Corridor alignment identified as part of the 2012 RTP would be analyzed in more detail through an Environmental Impact Report (EIR).
116-40	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	The Goods Movement Environmental Strategy and Action Plan schedules full operational deployment of zero and near zero-emissions for trucks in 2018.	Comment noted. For clarification, SCAG's Goods Movement Environmental Strategy identifies deployment of zero and near zero emission trucks beginning in 2016 and continuing through 2035.
116-41	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	This plan prematurely predicts that the infrastructure, market and technology will be available for use without taking into consideration funding shortfalls and without putting in place earlier interventions.In the meantime, east-west corridor adjacent communities will be adversely impacted by displacement, or over-burden suffering from adverse health and quality of life impacts associated with the construction of the project and the trucks that will eventually utilize the route.	Comment noted. The East-West Freight Corridor is anticipated to serve as a platform for the introduction and adoption of zero-emissions/near-zero-emissions technology for freight. While the specific technology has yet to be defined for the project, some zero-emission/near-zero-emissions technologies currently exist. SCAG will work closely with its partners and regional stakeholders to identify appropriate funding mechanisms for the East-West Freight Corridor project. The East-West Freight Corridor offers the possibility of reducing congestion and air quality impacts to those communities adjacent to high truck volume corridors.
116-42	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative	SCAG must go beyond investing in research and guarantee that all lanes classified as zero-emission truck-only lanes only be used by zero-emission trucks.	Comment noted. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission/near-zero-emissions trucks. This system offers the opportunity to incentivize the adoption of clean, zero-emission/near-zero-emissions technologies for regional freight movement. SCAG continues to support efforts by regional

ID	Name	Affiliation	Comment	Response
		letter)		partners and stakeholders to address goods movement emissions and impacts and encourage the use of zero-emission/near-zero-emissions technologies as appropriate.
116-43	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Before considering adding this project [East West Corridor] to the RTP/SCS, SCAG must address the following: 1. Provide health and community demographic data on impact on the east-west corridor project. Specifically data that shows potential neighborhoods which may be displaced, noise and air quality impacts on surrounding communities, race, class, socio-economic status of the communities that will be impacted and how many of them are COCs.	Comment noted. The East-West Freight Corridor is envisioned to be a facility used by zero-emission/near-zero-emissions trucks and anticipated to reduce harmful emissions, particularly for adjacent communities. The specific alignment and potential alternatives would be analyzed in more detail through an Environmental Impact Report (EIR). Specific air quality and noise impacts would also be analyzed in more detail through the EIR.
116-44	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	2. Develop an analysis of the local roadway systems that trucks will utilize once they have reached their destination.	Comment noted. Specific routes utilized by trucks are often influenced by numerous variables (origin/destination, trade volumes, seasonality, land-use decisions, facility regulations, etc.). Models are used to determine volumes on major routes used by trucks including freeways and major arterials. Analysis of the specific impacts upon local roadways would be addressed in more detail through an Environmental Impact Report (EIR).
116-45	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	3. Develop an analysis of the total number of on-ramps and off-ramps planned for the east-west corridor, an approximation of where they will be (i.e. which streets will be used for entering and exiting the east-west corridor), and the configuration/style of each on-ramp and off-ramp.	Comment noted. Specific ingress/egress points for the East-West Freight Corridor would be identified in greater detail through an Environmental Impact Report (EIR).
116-46	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	4. Define the performance measures that would outline how success would be measured for the proposed east-west corridor, including anticipated truck traffic counts.	Comment noted. Specific measures of effectiveness (MOEs) were utilized for preliminary screening of alternative alignments. Further work would be conducted including defining specific performance measures/criteria for the East-West Freight Corridor under future study initiatives.
116-47	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	5. Set outreach and communication guidelines that allow for greater public participation from the general public and pertinent partners and timely feedback to questions asked.	Comment noted. SCAG will continue to conduct outreach with regional partners and stakeholders on the East-West Freight Corridor. An Environmental Impact Report (EIR) would also require significant outreach and collaboration with stakeholders and the public.

ID	Name	Affiliation	Comment	Response
116-48	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	6. Include an outreach and engagement plan that includes impacted COCs, stakeholders and health advocates, as part of the Goods Movement and Environmental Strategy Action Plan.	Comment noted. SCAG will continue to conduct outreach with regional partners and stakeholders on the East-West Freight Corridor. An Environmental Impact Report (EIR) would also require significant outreach and collaboration with stakeholders and the public.
116-49	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	VII. SCAG Must Support National Efforts to Create a Strategic Plan for the Freight System. Given the limitations with funding our goods movement and particularly the zero emissions and near zero emissions freight strategy, we encourage SCAG to include language that clarifies the current federal funding constraints and alter the 2012 RTP/SCS to reflect that these revenues are assumed but not assured and are contingent upon passage of the MAP-21 program on page 95 and 100.	Comment noted.
116-50	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	As a revenue source the inclusion of this funding is still in doubt as the current iteration of the House American Energy and Infrastructure Jobs Act does not include a national freight program or any dedicated freight funding and the establishment of this program is contingent upon a freight program making its way into the final federal transportation reauthorization and that legislation passing through both Senate and House.	Comment noted.
116-51	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	SCAG should actively support the passage of a federal freight program that would deliver these revenues and clearly establish improving public health on the freight network and adjacent communities as an overarching priority and goal of the federal freight program, and support the inclusion of Senator Lautenberg's Freight Act of 2011 in the final federal transportation reauthorization with the competitive grant program and the goals and objectives as written.	Comment noted. SCAG, in coordination with our regional partners, continues to actively support the passage of a national freight program.
116-52	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	We support the addition of this language as offered by Senator Lautenberg and the inclusion of Senator Lautenberg's FREIGHT Act of 2011(Focusing Resources, Economic Investment, and Guidance to Help Transportation) in the Commerce Committee bill S. 1950 the Commercial Motor Vehicle Safety Enhancement Act of 2011 which would create a national strategic plan for the freight system, a competitive grant program, and establish clear goals and objectives including reducing emissions, improving safety and efficiency, enhancing economic competitiveness, use of innovative technologies, and improving the state of repair of	Comment noted. SCAG, in coordination with our regional partners, continues to actively support the passage of a national freight program.

ID	Name	Affiliation	Comment	Response
			existing infrastructure.	
116-53	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	VIII. The RTP/SCS Must Focus Attention on Cleaning Up Existing Freight Corridors, Not Just the Proposed New Projects. While we welcome zero emission technology by the year 2035, more short term gains must be implemented.	Comment noted. As part of the 2012 RTP, SCAG identifies and supports a number of regional projects, both existing and new, intended to address the movement of freight throughout Southern California. These projects have been identified through analysis and collaboration with regional partners and stakeholders and can be found in the RTP project list. Additionally, following the adoption of the 2012 RTP, SCAG will release the final version of the Comprehensive Regional Goods Movement Plan and Implementation Strategy, a multi-year effort to identify a fully-integrated regional goods movement system.
116-54	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	SCAG should incorporate what can be done until a majority of truck traffic is zero or near zero emissions and consider using currently available technology while working to demonstrate future technology applications (such as maglev technology).	Comment noted. Emissions from goods movement activities are a concern for the SCAG region. SCAG continues to support efforts by regional partners and stakeholders to address goods movement emissions and impacts on communities through such initiatives as the San Pedro Bay Ports Clean Air Action Plan.
116-55	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Additionally, SCAG member governments must include a zero emission corridor from the ports to the ICTF or along Alameda Street and strengthen specific requirements in new projects beyond “bare minimum” standards used in current projects.	Comment noted. Further clarification will be provided in the text of the RTP.
116-56	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	IX. The RTP/SCS Must Include Public Health as an Overarching Goal of the Goods Movement Element. More and more research is associating air pollution with asthma prevalence, poor lung function and a series of other health impacts. The California Air Resources Board states that the “prevalence of asthma in the U.S. has increased by more than 75% since 1980”. Furthermore results from the USC Children’s Health Study, a ten year study, show that children in Southern California’s more polluted communities “suffer reduced growth of lung function, asthma exacerbations, more school absences, and new onset asthma”.	Comment noted. The RTP/SCS evaluates region-wide impacts on various demographic groups. New to the Title VI and Environmental Justice analysis for the 2012 RTP/SCS, SCAG has mapped exposure to ozone, concentration of particulate matter emissions, cancer risks, and respiratory hazard risks. In order to assess the impact of emissions on various demographic groups throughout the region, emissions information was summarized to the Environmental Justice communities. In addition, the Program Environmental Impact Report for the RTP/SCS included a Health Risk Assessment in Appendix F. Please note that the Environmental Justice Appendix has been revised to include health impacts on children 5 years and below, as further recognition of this important public health issue.

ID	Name	Affiliation	Comment	Response
116-57	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	The public health evidence is growing. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, and not just the region's economic growth.	Comment noted.
116-58	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	SCAG must: 1. Include public health as an overarching goal in the Goods Movement Element and include performance standards to measure improvements.	Comment noted. Public health is a goal of the 2012 RTP GM Environmental Strategy and is also identified in the overall performance measure section of the RTP.
116-59	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	2. Include public health as an overarching and priority and goal in the $2.1 billion annual freight program included in the Environment and Public Works Committee.	Comment noted.
116-60	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	3. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially in low income communities of color overburdened by air pollution and higher rates of uninsured residents.	Comment noted.
116-61	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	X. Public Participation Failures Must Be Remedied. Outreach and education to the public, especially on the onset on this process, was not sufficient to ensure that an adequate representation of members from impacted communities participate and give meaningful input.	Comment noted. SCAG has provided significant opportunity for input to the 2012 RTP. This included, but was not limited to, the SCAG RTP website, policy and committee meetings, a series of eighteen public workshops held during Summer 2011, and eighteen additional workshops and public hearings held following the release of the Draft 2012 RTP. These workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders. (Please see the SCAG 2012 RTP Public Participation Plan at http://www.scagrtp.net/content?c=06.) However, SCAG will

ID	Name	Affiliation	Comment	Response
				continue to work with partners and stakeholders following the adoption of the 2012 RTP.
116-62	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	There were not enough public meetings or an adequate outreach strategy to ensure that there was more community involvement in this important process.	Comment noted. SCAG has provided significant opportunity for input to the 2012 RTP. This included, but was not limited to, the SCAG RTP website, policy and committee meetings, a series of eighteen public workshops held during Summer 2011, and eighteen additional workshops and public hearings held following the release of the Draft 2012 RTP. These workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders. (Please see the SCAG 2012 RTP Public Participation Plan at http://www.scagrtp.net/content?c=06.) However, SCAG will continue to work with partners and stakeholders to improve public outreach efforts following the adoption of the 2012 RTP.
116-63	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	Furthermore, a Goods Movement Steering Committee was established under SCAG to provide guidance and recommendations to SCAG's 2012 RTP/SCS; however, no formal process was established to receive formal recommendations from this group on the 2012 RTP/SCS.	Comment noted. SCAG has provided significant opportunity for input to the 2012 RTP. This included, but was not limited to, the SCAG RTP website, policy and committee meetings, a series of eighteen public workshops held during Summer 2011, and eighteen additional workshops and public hearings held following the release of the Draft 2012 RTP. These workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders. (Please see the SCAG 2012 RTP Public Participation Plan at http://www.scagrtp.net/content?c=06.) However, SCAG will continue to work with partners and stakeholders to improve public outreach following the adoption of the 2012 RTP.
116-64	Patty Ochoa	Physicians for Social Responsibility, and Other Organizations (collaborative letter)	We commend SCAG for completing the first Sustainable Community Strategy for the region and look forward to working with SCAG to ensure that it truly is a successful SCS by prioritizing health and equity.	Comment noted.
117-01	Eric Shen	Port of Long Beach	On behalf of the Port of Long Beach, thank you for the opportunity to review and comment on the draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy	Comment noted.The statistic has been changed as requested.

ID	Name	Affiliation	Comment	Response
			(RTP/SCS), including the Goods Movement Report contained within the RTP/SCS and the draft Program Environmental Impact Report. In general, we find these reports are well-written and accurate with respect to maritime activities. We would like to offer one minor correction. Maritime Ports The statistic for the Ports of Long Beach and Los Angeles in the second paragraph, second sentence of the PEIR on page 3.12-15 is incorrect. The ports of Long Beach and Los Angeles combined are the world's sixth-busiest port complex in 2011 (15.8 million total TEU), after Singapore (23.2 million TEU), Hong Kong (22.4 million), Shanghai (18.1 million) and Shenzhen, China (16.2 million). As noted in the PEIR, 34% of the jobs in the region depend on the goods movement industry. However, our region, with a combined population over 18 million residents, is bearing the brunt of traffic congestion, safety and air quality impacts. The Port of Long Beach is committed to developing programs that will support the anticipated growth in trade activities with minimum impact on the region's environment. The Port cannot do it alone – and we stand ready to work with you in implementing programs envisioned in the Regional Transportation Plan/Sustainable Communities Strategy.	
118-01	Eric Shen	Port of Long Beach	California Coastal Trail: Please revise the map shown as Exhibit 19 to reflect the Coastal Trail route connecting San Pedro and Long Beach via Terminal Island. This is consistent with recent plans to include a Class 1 Bike Path as part of the Gerald Desmond Bridge Replacement Project, including Coastal Commission's condition of approval on the Harbor Development Permit for the project. The Class 1 Bike Path is also consistent with both the cities of Los Angeles and Long Beach Bicycle Master Plans.	Comment noted. Exhibit 19: California Coastal Trail depicts what is being proposed by the California Coastal Commission. SCAG is proposing the CCT go over the Vincent Thomas Bridge (Replacement) and the Gerald Desmond Bridge (Replacement) based on the California Coastal Commissions qualified endorsement of the Gerald Desmond Bridge replacement. The Active Transportation Appendix will incorporate language to reflect that proposal.
119-01	Eric Johnson	Puente-Chino Hills Task Force of the Sierra Club	Thank you for the opportunity to comment on the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). The Puente-Chino Hills Task Force of the Sierra Club is based in Brea but our members come from the four counties that touch the Puente-Chino Hills. We offer hikes, sponsor educational events and provide input on projects that threaten the biological and recreational integrity of this important region. We are writing to provide comments on the Draft 2012 RTP/SCS and the Draft Program Environmental Impact Report (PEIR). We	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, based on input from a wide variety of stakeholders. Language has been clarified.

ID	Name	Affiliation	Comment	Response
			are so pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is a remarkable first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership. Under the Endangered Species Act, the United States Fish and Wildlife Service have defined critical habitat as areas that support endangered or threatened species that are essential to the species' conservation. The description in the Conservation Planning Policy section (page 76 of the Draft 2012 RTP/SCS) states "large-scale acquisition and management of critical habitat to mitigate impacts related to future transportation projects" [emphasis added]. We believe there are other habitat areas in the SCAG region worth considering for acquisition and management and therefore SCAG should not limit the mitigation opportunities to only critical habitat. We suggest expanding the language to incorporate all "important habitat lands."	
119-02	Eric Johnson	Puente-Chino Hills Task Force of the Sierra Club	On page 79 of the Draft 2012 RTP/SCS we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use decisions. We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of wildlife linkages in this section. Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well.	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation.
119-03	Eric Johnson	Puente-Chino Hills Task Force of the Sierra Club	We appreciate SCAG's effort to create a strategic planning process that would document important conservation lands in the region. We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values,	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include protected areas, based on input from a wide variety of stakeholders. A Greenprint is one possible option for the mitigation program that will be discussed with a wide variety of stakeholders in the future.

ID	Name	Affiliation	Comment	Response
			historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.	
120-01	Carol Banner	Realtors Committee on Air Quality	Comments on the Draft RTP/SCS. The RCAQ finds that the Draft Plan does not discuss or quantify the impact of the Plan on the affordability and availability of housing in the region. This information is of the utmost importance to the public and to elected officials in order to understand the consequences of increased infill development, density, open space preservation and other proposals in the Draft Plan that will change the size, type, cost and distribution of housing in the region. The impact that these strategies will have on housing affordability, and home ownership rates must be explained. At present, the Draft Plan discusses the changing population composition and a shift to multifamily housing in only the most general terms. The Scenario Outcomes on page 116 look at energy costs and water cost- but fail to examine housing costs. The Economic Impact Technical Report is silent on the housing cost and affordability impacts of the proposed major shifts in the housing supply. Recommended Revision: We request that the final Plan include a discussion in the SCS chapter that both qualitatively and quantitatively summarizes the proposed plan's impact on housing cost and affordability.	Comment noted. The Environmental Justice Appendix contains analysis of key indicators and their trends in transit-oriented development areas that concern likely displacement and gentrification using 2000 Census data and 2005-2009 American Community Survey data. The results are inconclusive, but SCAG will continue to monitor these trends in the future. All jurisdictions in California must update their respective general plan housing elements. The housing element must demonstrate through a sites and zoning analysis how the jurisdiction would accommodate projected household growth for all income groups as determined by the Regional Housing Needs Assessment (RHNA). The draft 2012 RHNA allocation plan was developed using the same integrated growth forecast for the 2012 RTP/SCS. To ensure that each jurisdiction provides zoning for all types of housing, particularly affordable housing, the RHNA Plan applies a social equity adjustment to mitigate the disproportional distribution of low-income housing amongst jurisdictions groups in order to encourage planning for more affordable housing.
120-02	Carol Banner	Realtors Committee on Air Quality	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 64.
121-01	Jeffrey Dinkin	Regent Properties	The SCS does not appear to account for projects already in process. Regent has several projects with pending applications that represent a substantial investment of resources to design, plan, and communicate with responsible agencies. While the SCS itself states that it was created with input from local jurisdictions, 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 made by local jurisdictions. more specifically, while the draft RTP/SCS indicates that it 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	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.

ID	Name	Affiliation	Comment	Response
			resources processing.	
121-02	Jeffrey Dinkin	Regent Properties	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 TAZs (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 [TAZ] 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	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The TAZ-level dataset was provided upon request during the comment period.

ID	Name	Affiliation	Comment	Response
			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. S500 et. seq) and California Administrative procedures Acts (Gov. Code SS11340 et. seq., including S 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.	
121-03	Jeffrey Dinkin	Regent Properties	Implications of Consistency with underlying TAZ data. The importance of 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…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 funds must be consistent with an approved RTP, and with the adoption of SB 375, that includes consistency with the SCS portion of the RTP as well. 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	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			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.	
121-04	Jeffrey Dinkin	Regent Properties	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 those 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 such a small scale of each TAZ would be inappropriate and overly prescriptive…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 lowest, the level of comparison should be at the 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 the	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			(i) jurisdiction , and the (ii) sub-region (i.e., where unincorporated county land is divided into sub-regions). Despite SB 375's mandate that the SCS not regulate land use, the draft RTP/SCS "shifts" households "from the periphery into the urbanized core" stating that much of this shift "will occur naturally in the marketplace," and that this "shift" was done "per consultation with the local jurisdictions." (Draft RTP/SCS p. 128). However, this shift does not "occur naturally," nor through a "consultation" process between agency staff that excludes the public. Instead, such a shift can only occur, if at all, as part of a separate and lengthy discretionary development application process involving requests to local land use jurisdictions to amend their general plans, specific plans, area 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.	
122-01	Sandy Cajas	Regional Hispanic Chamber of Commerce	For the past three years, business and industry representatives from throughout Southern California have participated in the Southern California Association of Government's extensive process used to develop the region's Draft 2012 Regional Transportation Plan (RTP), which includes an inaugural Sustainable Communities Strategy (SCS). Our interest in this process has been particularly keen given both the significant economic challenges currently facing our region's economy and the fact that the inaugural SCS could – if not considered from many viewpoints – have unforeseen negative consequences. In light of our ongoing participation and understanding, we appreciate the tremendous effort that SCAG's staff and leaders have put into the process that led to the Draft 2012 RTP/SCS & PEIR. The development of this RTP/SCS followed an inclusive approach with SCAG holding hundreds of meetings with SCAG's public and private stakeholders. We also appreciate the extensive economic analysis that SCAG has performed on the Draft RTP/SCS in order to provide all stakeholders and SCAG's Regional Councilmembers with an understanding of the financial impacts of the plan. As representatives of Southern California's broader business community, we recognize the crucial roles that transportation and infrastructure have in	Comment noted.

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			maintaining our region's economy and quality of life. Accordingly, through this letter, we join together to provide SCAG with general comments regarding remaining significant concerns about the contents of both (i) the Draft 2012 RTP/SCS, and (ii) the Draft Program Environmental Impact Report (PEIR).	
122-02	Sandy Cajas	Regional Hispanic Chamber of Commerce	From the beginning, representatives of businesses and industries have agreed upon the qualities of a good RTP/SCS. Those qualities can be summarized as follows. The RTP/SCS should: Foster economic growth and job creation in a balanced and accountable manner and in recognition of foreseeable regional population growth;	Comment noted. Please see Regional Goals on page 13 of Chapter 1, Vision.
122-03	Sandy Cajas	Regional Hispanic Chamber of Commerce	Utilize all revenue sources very efficiently, and utilize new revenue sources only if they are economically sound and equitable	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
122-04	Sandy Cajas	Regional Hispanic Chamber of Commerce	Honor the prerogatives that local governments – as the level of government with the greatest understanding of and sensitivity to community interests and context – should continue to enjoy concerning land use and community development	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations be consistent with the SCS. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.

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122-05	Sandy Cajas	Regional Hispanic Chamber of Commerce	Comply with the California Environmental Quality Act (CEQA) and federal environmental laws and regulations (e.g., federal Clean Air Act conformity); and Allow for expeditious review and approval of projects that are consistent with a sound and reasonably accommodating RTP/SCS.	Comment noted. The RTP/SCS creates opportunities for business, investment, and employment in Southern California. This plan does so by proposing over $500 billion of investment in the next 25 years. This constitutes the largest regional-scale infrastructure jobs program in Southern California's history. This will put thousands of Southern Californians back to work in much needed jobs, not only in construction, but also in a broad cross-section of industry clusters. Over the twenty-five year period, the plan will generate 4.2 million jobs in the six county region. This represents the direct economic effect of designing, building and maintaining projects, as well as the indirect and induced benefits of the investments.
122-06	Sandy Cajas	Regional Hispanic Chamber of Commerce	Allow for expeditious review and approval of projects that are consistent with a sound and reasonably accommodating RTP/SCS.	Comment noted. The RTP/SCS creates opportunities for business, investment, and employment in Southern California. This plan does so by proposing over $500 billion of investment in the next 25 years. This constitutes the largest regional-scale infrastructure jobs program in Southern California's history. This will put thousands of Southern Californians back to work in much needed jobs, not only in construction, but also in a broad cross-section of industry clusters. The analysis conducted by SCAG and consultant team identified 174,500 as associated with spending approximately $21 billion per year as outlined in the 2012 RTP/SCS for capital projects and operating and maintenance expenditures. The 174,500 is an annual average associated with the RTP spending but it is not a cumulative number. In addition SCAG estimated that implementation of 2012 RTP/SCS projects and strategies could support as many as additional 354,000 jobs (on average for 2010-2035) as result of productivity benefits from travel time and cost savings and the associated impact on regional economic competitiveness.
122-07	Sandy Cajas	Regional Hispanic Chamber of Commerce	Despite our overall appreciation for the work put in by SCAG's staff, there are important aspects of the Draft 2012 RTP/SCS and Draft PEIR which, we believe, require much more consideration and correction or clarification before SCAG approves the 2012 RTP/SCS and the Final PEIR. Corrections – or at least substantial clarifications – are needed in order to bring the Final 2012 RTP/SCS and PEIR back into line with the principles set forth above. Stated here in the most general terms, SCAG's staff and ultimately its Regional Council should address the following concerns and correct the final 2012	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance only, and the growth and land use assumptions for the RTP/SCS are to be adopted at the jurisdictional level.

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			RTP/SCS and the accompanying PEIR. 4) The RTP/SCS is undergirded by analysis which shows the dispersion of populations and employment shown and categorized at the level of sub-jurisdictional "transportation analysis zones" (TAZs). The TAZ level of detail is, we believe, too small and precise a level at which to prescribe the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. Page 148 of the SCS should therefore be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or sub-regional level, not at a TAZ level.	
122-08	Sandy Cajas	Regional Hispanic Chamber of Commerce	5) The RTP/SCS should aim to reflect and accommodate both the short-term future of the SCAG region and its long- term future. For example, the RTP should better anticipate the need for and reasonable likelihood of a gradual transition in the region's overall vehicle fleet (e.g., gradually towards alternative fuels) and the ongoing need for enhancements to vehicular mobility even as more mass transit comes to fruition.	Comment noted. The 2012 RTP is a long range planning document that accounts for vehicle fleet turnover and presents both near-term and long-term strategies to address the on-going need for enhanced mobility in all transportation modes.
122-09	Sandy Cajas	Regional Hispanic Chamber of Commerce	6) More detail, clarity and explanation are needed concerning the new revenue sources that are outlined within the plan document. New revenues account for $219.5 billion out of the total $524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS). To fully and fairly evaluate these proposals, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following: a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement. b. The new revenue sources within the RTP must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it	Comment noted. The Transportation FinanceAppendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.

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			is proposing.	
122-10	Sandy Cajas	Regional Hispanic Chamber of Commerce	7) New revenues from fees on businesses operating in the SCAG region – and particularly the "Freight Fee/National Freight Program" listed on page 96 of the Draft RTP – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region's competiveness will be compromised.	Comment noted. The RTP does not assume the implementation of local, regional, or statewide freight fees. Ensuring that the SCAG region or its member entities are not an economic disadvantage were critical considerations used in the development of all funding proposals included in the RTP.
122-11	Sandy Cajas	Regional Hispanic Chamber of Commerce	8) In the RTP, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system. It would be helpful for SCAG to state clearly in the RTP that, to date, stakeholders have not reached consensus on technologies, timing, funding, or emissions impacts of the various options that SCAG examined in the RTP. For example, SCAG discusses long-term steps towards a "Zero Emissions Container Movement System" (ZECMS). If SCAG chooses to pursue such a fundamental shift in new technology, it would need to work with all goods movement stakeholders to clearly establish whether and, if so, when and where within the transportation infrastructure a ZECMS option could be demonstrated and evaluated without negatively effecting the velocity and throughput of the system.	Comment noted. SCAG recognizes the significant contribution of the goods movement sector to the regional and state economy. We concur that any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, and reliability of the goods movement system. SCAG will continue to work with all goods movement stakeholders in further evaluating technology options.
122-12	Sandy Cajas	Regional Hispanic Chamber of Commerce	9) With the recent elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is challenged, given the costs related to aging or inadequate infrastructure capacity and high development costs for higher density projects. The elimination of redevelopment agencies also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. In fact, since the passage of SB 375, the State of California has stripped local governments of funds that were previously available for transit, transportation and redevelopment. This follows many years in which the state diverted revenues from gasoline, sales, income and other taxes needed for local government programs. Local governments cannot help to fulfill the 2012 RTP/SCS without increased, not	Comment noted.

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			decreased, state support. SCAG should emphasize the need for the state to restore support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to speed the attainment of mandated goals. While we find many very positive aspects in the plan, especially related to principles and direction, these significant issues need to be addressed. The short list of general concerns set forth above is not meant to be exhaustive. Many of the organizations that subscribe to the above-stated comments will be commenting more robustly in separate writings. We join here, however, to express our unity in finding the Draft 2012 RTP/SCS and PEIR to be in need of significant clarification and correction. We are also jointly committed to completing this process and, over the remaining weeks, working closely with SCAG to develop and adopt a smart, flexible, accountable, and economically sound RTP/SCS.	
123-01	Tony Largo	Reservation Transportation Authority	The Reservation Transportation Authority (RTA) is a consortium of Southern California Tribes, providing transportation services to tribes located in Santa Barbara, San Bernardino, Riverside and San Diego Counties. Our charge is to contract for funds to plan, design and construct new roads on reservations but also to act as a transportation advocate on behalf of the RTA Member Tribes. 1-States receive Federal Highway funding that is intended to include Tribal projects. But as tribes attempt to participate and gain funding for tribal road improvement projects, the tribal projects receive little or no consideration for funding. While tribes are specifically included by law they are excluded by practice. The State funding process must be weighted in such a manner that would allow tribal transportation projects access and consideration to develop transportation infrastructure projects. With the understanding that tribes have not been able to historically participate and do not have the ability to staff a tribal program, in comparison to local governments. Tribal Governments enjoy a special and unique distinction as governments different than a local government and not subservient to a state agency. 2-With few exceptions Reservation Lands are not located within metropolitan areas. However Reservations, even though located in rural areas can produce generate high volumes of traffic depending on the types of development that the Reservations	Comment noted. We agree that government, business, and stakeholders such as tribes need to work together to identify and advance the best, most appropriate funding options to provide needed funding for RTP priorities. SCAG's Regional Council and Policy Committees include representation from the tribal governments within SCAG. We will continue to work with tribes in our future planning efforts.

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			are involved in. Studies need to reflect reservation development and show the impacts related to Compass Blueprint strategies. 3-Understanding that tribal transportation facilities are old and may have been constructed with scarce dollars, without consideration to the need for sidewalks and gutters and drainage and lighting. If these improvements are a consideration for "Sustainability" then it should be a given that tribes should are in need. When many of the tribal improvements were made and every dollar was needed to complete a new road, nobody would ever dare to include any amenities other than pavement. Historically tribes would receive funding to build a road and then because of limited funding would not receive road construction funds again.	
123-02	Tony Largo	Reservation Transportation Authority	4- Local traffic counts and Caltrans traffic counts do not present tribal traffic data, especially accident data for reservations. While Tribal Reservations are in rural areas there are often high traffic counts, from visitors/tourist. Jurisdiction for reservation traffic counts is the domain of the BIA and correlation of the data needs to be reflected accordingly as well as tribal data that is captured to support development activities.	Comment noted. For the RTP/SCS, SCAG conducts traffic counts at the screen-line level, at a regional scale. Traffic counts for local projects or planning studies would be conducted by the local lead agency. SCAG will continue to work with state and local agencies and tribal representatives as appropriate to find ways to improve its traffic database.
123-03	Tony Largo	Reservation Transportation Authority	5-VMT if carried out would impact rural reservations disproportionately just based upon the additional miles of travel required for rural reservation residents. This seems unfair in comparison to the fuel tax per mile currently in place, which is also unfair since tribe do not receive a return share of the tax like local and county governments do.	Comment noted. The proposed mileage-based user fee, like the existing state and federal gas excise taxes, is directly linked to the amount of transportation resource used. While the mileage-based user fee would charge drivers for each mile traveled, the existing gas excise taxes charge drivers for each gallon consumed. The amount of gallons of gas consumed is a direct product of the total number of miles traveled. While the implementation of the mileage-based user fee would not cause any drivers to increase the number of miles traveled, it would provide additional revenue to fund transportation improvements that could allow for easier, faster, and safer travel options throughout the SCAG region. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users.
123-04	Tony Largo	Reservation Transportation Authority	6-How can tribal transit systems be efficiently operated or even provided and integrated with other transit systems when the tribal lands are so rural?	Comment noted. SCAG looks forward to continuing to wotk with tribes within SCAG to investigate the efficient integration of tribal transit networks into other transit networks.

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123-05	Tony Largo	Reservation Transportation Authority	7 – What tribes currently sit on SCAG's Regional Council and policy committees? The RTA wants to be supportive of the comments that may have been submitted by other tribes and we do not want to contradict the needs submitted by other tribal representatives.	Comment noted. Mark Calac, Chairman, Pechanga Band of Luiseño Indians, serves on SCAG's Regional Council and Executive/ Administrative Committee. Brian McDonald, Councilman, Chemehuevi Indian Tribe, serves on SCAG's Transportation Committee. Charles Martin, Councilman, Morongo Band of Mission Indians, serves on SCAG's Community, Economic and Human Development Committee. John Palinkas, Board Member. Pechanga Band of Luiseño Indians, and Jim Cohen, Deputy General Counsel, Pechanga Band of Luiseño Indians, serve on SCAG's Energy and Environment Committee.
123-06	Tony Largo	Reservation Transportation Authority	8 – How can the tribes and SCAG better collaborate with each other in developing and applying for transportation grants that benefit tribal areas? There appears to be hesitation at the State level, perhaps because they are inexperienced in dealing with grant applications from tribal groups. Thank You, Tony Largo, RTA	Comment noted. While SCAG does partner for planning grants, the county transportation commissions are your best resource for collaboration on funding for non-planning activities. For land use planning assistance, please contact SCAG Compass Blueprint staff. SCAG also employs Regional Affairs Officers within each county in the SCAG region that can serve as a single-point of contact for SCAG.
124-01	Mochael Osur	Riverside County Department of Public Health	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 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.	Comment noted.
124-02	Mochael Osur	Riverside County Department of Public Health	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.	Comment noted. SCAG is currently in the process of enhancing our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016.
124-03	Mochael Osur	Riverside County Department of	Focus on investments on completing transit systems and building out transit infrastructure, rather than highway expansion, including the following: Doubling Metrolink ridership	Comment noted. The RTP includes a significant expansion of transit service in the Inland Empire, including new and improved rail service, new BRT and express bus service, and improved

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		Public Health	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.	frequencies of local fixed-route bus services.
124-04	Mochael Osur	Riverside County Department of Public Health	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.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates. SCAG cannot unilaterally change the near term commitments that are already in place. Significant increase in funding for active transportation proposed in the 2012 RTP/SCS is largely predicated on additional revenues from new sources that will require future actions at the state and/or federal levels. Therefore, the plan realistically assumes that these funds will not be available in the near term. The earliest these funds are expected to be available is 2026.
124-05	Mochael Osur	Riverside County Department of Public Health	Increase investments in zero emission freight transportation in order to reduce diesel emissions and exposures in communities near freight corridors and rail yards. Ensure that funding mechanisms are in place to expedite the implementation of the zero and near-zero emission freight and truck strategies and infrastructure. Prioritize spending on projects that deliver maximum health benefits for residents of the region, especially those living along the freight corridor.	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. This system also offers the opportunity to incentivize the adoption of clean, zero-emission technologies for regional freight movement. SCAG also continues to support efforts by regional partners and stakeholders to address goods movement emissions and

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				impacts on communities such as the San Pedro Bay Ports Clean Air Action Plan. SCAG also supports the implementation of all freight projects listed in the 2012 RTP and continues to work closely with regional implementation agencies to advance their completion. Further, the 2012 RTP includes an Environmental Action Plan that will lead to the deployment of zero emission technologies in the timeframe necessary to meet federal requirements.
124-06	Mochael Osur	Riverside County Department of Public Health	Evaluate the number and type of new developments that could be located in close proximity to freeways and traffic roadways in the SCAG region under the new RTP. Work with the 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.	Comment noted. SCAG prepared additional analysis to highlight the emissions exposure in areas within 500 feet of freeways and high volume roads. It should be noted that the level of emissions near these facilities is higher than in the region as a whole. In 2035, these areas still will have higher emissions than the region as a whole. However, while regional emissions overall decrease between now and 2035, the rate of decrease near freeways and high volume roads is even greater. The RTP/SCS does result in an increase in population in these locations, and as such health risk is higher for these individuals than if they were not in the buffer area. As such, subsequent project level analysis and mitigation should be cognizant of on-going health concerns. However, the plan as a whole shows benefits for emissions exposure and decreased levels of risk in areas near freeways.
124-07	Mochael Osur	Riverside County Department of Public Health	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 66.
125-01	Carolyn Luna	Riverside County Planning Department	(Part 1 of 2) One of the biggest changes in the RTP/SCS 2012 is its emphasis on higher density residential development and its concentration within the High Quality Transit Areas (HQTA) to accommodate the changing demand in types of housing. To a certain extent, this is true on a regional level; however, the trend is not necessarily mutual when each area is separated out of the SCAG region. Inland counties still see the demand for single family housing, and when the economy rebounds, the County of Riverside still plans on managing the growth of the single family housing market through its General Plan. SCAG should address the fact that growth is still occurring in the Inland counties as evidenced by the recent census. Table 4, 8, 10, and 11 of the RTP Growth Forecast shows the past, current	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. Based on the agreed-upon forecasted growth of population, household and employment at the jurisdictional level for Riverside County, SCAG shifted some of the growth to HQTAs while maintaining jurisdiction level forecast control totals for the Plan Alternative.

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			and forecasted trends for each county in the region. Example: Riverside County's share of regional population in 1990 was 8%, in 2000 it grew to be 9.4%, and then 12.1% in 2010. Even with SCAG assumptions shown in Table 8 of the Growth Forecast, the share of the population for Riverside County grows to 15% by 2035 equaling that of Orange County. In contrast, the share of population in Los Angeles County diminishes to 51% from 54% and employment to 51% from 57% by 2035. Riverside County would like to compare the projection numbers of 2020 and 2035 with SCAG's growth forecasts. Riverside County population projections of 2010 is 2,153,189 and 2035 is 3,396,287. Using the example above, an inferred conclusion can be made that SCAG's HQTA designations for 2035 (Exhibit 4.13 to 4.19) do not accurately reflect the population and employment trends shown in Table 8. It appears that HQTAs were designated based on existing Transit or Transportation corridors without considering the actual existing and proposed population centers of each jurisdiction in Riverside County. When HQTAs are compared together amongst all six counties, as in Exhibit 4.13, the share of HQTAs clearly do not show the 15% population share that Riverside County represents in 2035. Also, questions can be raised as to why Riverside County HQTAs do not connect to any of the surrounding counties such as San Diego County.	
125-02	Carolyn Luna	Riverside County Planning Department	(Part 2 of 2) In addition, when city boundaries are overlaid on top of Exhibit 4.18 (see handout 1), the unincorporated section of the County contains only one corridor with an HQTA on I-15 in Temescal Canyon. Currently, the unincorporated County has 355,718 people (excluding Jurupa Valley and Eastvale) and expects a population growth of 704,253 people by 2035, almost doubling the current number. Considering the County forecast and the historical growth trend of Riverside County, SCAG's placements of HQTAs become more questionable. How was SCAG able to redistribute 51 percent of the new residential growth in the unincorporated Riverside County? From Riverside County's perspective, the placements of the HQTAs are perceived to just be relocation of growth rather than managing growth. Riverside County would benefit greatly if the details of the land use and projection data analysis were shared with the local jurisdictions. Currently, based on the plan and the PEIR, the land use analysis and local inputs on the data incorporations	Comment noted. HQTAs are geographic areas within a half mile radius of an existing or planned major transit stop or high-quality transit corridor with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute period. Development projects proposed in these areas may be considered for potential CEQA streamlining if they meet certain criteria set forth under CEQA. HQTAs are defined by legislation; however, we have considered and incorporated land use strategies to be considered by local jurisdictions for areas that may eventually become HQTAs. To calculate the growth in HQTAs, SCAG distributed the growth forecast data to transportation analysis zones (TAZs), selected TAZs that had 25% or greater of their land within HQTAs, and then computed the sum of the selected TAZs' households.

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			are not clearly outlined. Example: PEIR 2.25 states, "The SCS focuses the majority of new housing and job growth in High Quality Transit Areas (HQTA) and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for TOD." Again, looking at the HQTAs on a macro level, the jobs-housing balance goal may have been achieved based on the provided locations of the HQTAs, but if the HQTAs are separated out by counties, jobs-housing balance cannot be achieved in the Inland Empire region. As stated, "The 2012-2035 RTP/SCS assumes that 51 percent of new housing developed between 2008 and 2035 will be within HQTAs, along with 53 percent of new employment growth (compared with 39 and 48 percent, respectively in 2008)." (PEIR p.2-31). As indicated above, if most of the growth is still projected to occur in the Inland Empire region, achieving the goal of locating 51 percent of the new growths in the limited HQTAs in the Inland Empire is not feasible. Creating more urban centers within suburban counties achieve far greater jobs-housing balance than having the employment concentration heavily depend on Orange and Los Angeles Counties.	
125-03	Carolyn Luna	Riverside County Planning Department	Both of the SCAG documents have stated that the outreach efforts have allowed the organization to collect land use data from the local jurisdictions in developing the SCS, especially in Orange County and Los Angeles County (Gateway Cities COG). Riverside County also appreciates many opportunities and discussions on various levels of data sharing with SCAG. In the past, Riverside County has provided SCAG with General Plan Land Use data, Demographics/Socioeconomic data, and Growth Projections data with maps and comment letters on a TAZ level basis. All of these great efforts cannot be recognized if SCAG does not detail how they have incorporated the local jurisdiction inputs into the RTP/SCS and PEIR. Some projection data from SCAG was shared, but the discrepancies between SCAG and Riverside County data was not explained. (see attachment) Example: SCAG RTP/SCS and PEIR state, "SCAG shall encourage cities and counties in the region to provide SCAG with electronic versions of their most recent general plan (and associated environmental document) and any updates as they are produced" (MM-LU1), and "…Lead and responsible	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The growth and land use assumptions for the RTP/SCS are proposed to be adopted at the jurisdictionalgeographic scale. For a response concerning the specific mitigation measures in the PEIR, please see the Final PEIR Addendum Section 4.0, Responses to Comments on the

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			agencies can and should then make any necessary adjustments to the applicable General Plan. Any such identified adjustment shall be communicated to SCAG" (MM-PS11 and PS56). "As a result of this comprehensive and integrated approach, the transportation projects and strategies included in the 2012-2035 RTP/SCS are generally consistent with the county and regional level general plan data available to SCAG." (PEIR 3.8-13) SCAG should work with local jurisdictions to explain how the data provided by various agencies were used in the RTP/SCS, and SCAG also should ask local jurisdictions for interpretation of the provided land use data.	Draft RTP PEIR, Letter Number 67.
125-04	Carolyn Luna	Riverside County Planning Department	Growth forecasts at the jurisdictional level were approved by the Riverside County Board of Supervisors, the CVAG and WRCOG Executive Committees and were transmitted to SCAG in 2010. Subsequent to these policy level actions, County staff provided SCAG staff detailed growth forecast at the TAZ level. WRCOG did approve revised forecasts for the jurisdictions within its subregion and RTP/SCS 2012 - Comment Letter 02/14/2012 SCAG staff did adjust the forecasts for the Cities of Hemet, Menifee, and San Jacinto. The growth distribution of households and employment utilized in the RTP/SCS are not consistent with the TAZ level data provided to SCAG staff. It is therefore recommended that the growth forecasts are not approved at the TAZ level. It is further recommended that no findings of consistency and conformity, recommendations on the placement of infrastructure, or recommended funding be based on the TAZ level forecast used in the RTP/SCS plan. From the perspective of local jurisdiction, it is alarming and disconcerting to find that the data provided to SCAG can be modified without adequate methodologies or explanations.	Comment noted. SCAG has incorporated the most updated growth forecasts at the jurisdictional level with input from Riverside County into the SCAG's final growth forecast dataset for the 2012 RTP/SCS. SCAG's current proposal is to adopt the growth forecasts at the jurisdictional level as part of the final 2012 RTP/SCS.
125-05	Carolyn Luna	Riverside County Planning Department	"One of the most critical elements of the RTP/SCS is the financial plan. The RTP is required to be financially constrained, meaning that project costs must be matched with "reasonably available" revenues." Riverside County agrees with other COG comments on the Financial Plans of the RTP/SCS. There are some innovative funding mechanisms identified in the plan (Table 3.3 and 3.4.4), however, once again, the feasibility of the revenue identified in the RTP is questionable. In fact, it is very unlikely that much of the new supplemental revenues identified in the plan will materialize. There are no other alternatives	Comment noted. Federal regulations indicate a RTP meets the financial constraint requirement by including sufficient financial information for demonstrating that projects in the plan can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue

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			identified in the plan that would replace or augment the loss in revenue if the new funding measures fail. Implementation measures on the funding items should be more clearly outlined and planned for the local jurisdictions. Examples: 15c per gallon in addition to 18c per gallon current California State gas tax is almost doubling the tax rate. A mileage-based user fees are also identified in the plan that estimates about 5c per mile starting 2025 replacing current gas tax. In addition, the plan identifies E-Commerce Tax, Highway Tolls, and Special Districts.	than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. We also recognize that the future cannot be known with certainty and we therefore made reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and documented in the RTP to ensure transparency. As we gain more insight into the future and the reasonableness of our assumptions, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP.
125-06	Carolyn Luna	Riverside County Planning Department	RTP p.54: Complete Streets Discussion: "Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network." Riverside County continuously implements and updates its own trails network to create connectivity and accessibility. We would like to find out how SCAG's Exhibit 2.5 Regional Bicycle Network was developed before relying on the map provided in the regional plan. Such process should be a "bottom-up" process and not a "top-down" approach.	Comment noted. The SCAG Regional Bikeway Network within Riverside County was developed using the bicycle plans originally developed by the Western Riverside Council of Governments (WRCOG) and the Coachella Valley Association of Governments (CVAG) for their member cities and includes the local plans included therein as well as the WRCOG backbone and the CVAG Parkway 1e11. SCAG's Regional Bikeway Network within Riverside County illustrates gap closures between cities in order to promote bicycle connectivity between cities and counties and to develop a regional route structure, recognizing that development of specific additional facilities and locations for those facilities lies at the local level. We will welcome the County of Riverside's participation in the continued development of the Regional Bikeway Network
125-07	Carolyn Luna	Riverside County Planning Department	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 67.
126-01	Anne Mayer	Riverside County Transportation	Chapter 2, Transportation Investments Page 41, Congestion Management System - The 2012 RTP SCS address federal requirements for the Congestion Management System.	Comment noted. Federal CMP requirements dictated by 23CFR450.320 requires that adequate considerations be given to alternative strategies to Single Occupancy Vehicles (SOV) in

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		Commission	Specifically, the RTP SCS component contains Transportation Demand Management strategies, which is a required element for County Congestion Management Program to meet federal CMS guidance. The individual county CMPs, Caltrans CSMPs, and the SCS give the entire picture of the region's TDM efforts. Therefore, RCTC requests the following be removed: "First, SCAG will incorporate a requirement in the FTIP guidelines that calls for submittal of documentation by the sponsoring agencies associated with significant roadway capacity projects (greater than $50 million) to ensure documentation of all the alternatives considered in defining the project as well as identifying appropriate mitigation that would be implemented in conjunction with the project." This requirement should also be removed from the FTIP guidelines since a comprehensive view of the region's TDM projects and program is clearly highlighted in county CMPs, Caltrans CSMPs, and the RTP SCS.	conjunction with regionally significant roadway capacity projects included in the RTP as part of the CMP process. SCAG was specifically issued a corrective action by FHWA at the last MPO certification to address this issue by enhancing documentation of such considerations as part of the decision making process in identifying such projects. SCAG does not believe this requirement would add significant new burden to sponsoring agencies other than to provide applicable documentations such as the project study reports, EIR/EIS etc. that are generated as part of the project planning and decision making work.
126-02	Anne Mayer	Riverside County Transportation Commission	Page 43, Completing our System - Table 2.2 Major Highway Completion Projects includes one to two projects per county emphasizing "critical gaps in the network that hinder access to certain parts of the region." The project identified in Riverside Coutny is "CETAP Intercounty Corridor A." RCTC requests that this project be removed from the list and be replaced with the SR-79 realignment (RTP ID# RIV62024), and the I-215 widening project from Scott to Nuevo (RTP ID# RIV070309).	Comment noted. The referenced Table 2.2 is revised in the final RTP as requested by the commenter to replace CETAP Intercounty Corridor A with the SR-79 realignment and I-215 widening from Scott to Nuevo.
126-03	Anne Mayer	Riverside County Transportation Commission	Page 44, Completing Our System - Table 2.3 identifies Major HOV Projects for each county. The I-215 Bi-county project is listed under San Bernardino County from Spruce Street to Orange Show Road. This project is also in Riverside County. RCTC requests that SCAG clarify that the project is in San Bernardino, from Orange Show Road to the Riverside-San Bernardino County line, and in Riverside County from the Riverside-San Bernardino County line to Spruce Street. Table 2.3 does not include the SR-91 HOV lane project (RTP ID# 010212). RCTC requests that SCAG add this project to the table as it is a major highway project that will begin construction this year and, together with the I-215 Bi-county project, will provide a continuous HOV system from Orange County to San Bernardino County along the SR-91/I-215 corridor.	Comment noted. The SR-91 HOV lane project (RTP ID# RIV010212) is currently listed in the referenced Table 2.3, as SR-91 from Adams to SR-60/215. Table 2.3 has been updated to correctly depict the Riverside County segment location for the I-215 Bi-County project.
126-04	Anne Mayer	Riverside County	Page 46, Strategically Expanding Our System - Exhibit 2.1 Major Highway Project - This map highlights highway improvement	Comment noted. The referenced Exhibit 2.1 has been revised to include the Mid County Parkway and SR-79 Realignment.

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		Transportation Commission	projects to be implemented by 2035. RCTC requests that the Mid County Parkway (RTP ID# RIV031218) and SR-79 realignment (RTP ID# 62024) be added to the map.	
126-05	Anne Mayer	Riverside County Transportation Commission	Page 76-79, Environmental Mitigation - This section discusses Conservation Planning, Biological Resources and Open Space, Locations for Mitigation, etc. RCTC requests that SCAG include Riverside County's Multiple Species Habitat Conservation Plan efforts in Western County and Coachella Valley in this section as an example of what counties are doing to mitigate environmental impacts.	Comment noted. The MSHCP effort in Riverside County is an excellent example and has been added to the referenced Environmental Mitigation discussion.
126-06	Anne Mayer	Riverside County Transportation Commission	Chapter 4, Sustainable Communities Strategy Page 128, Resources Areas and Farmland - This section talks about areas to be protected from development including parklands, open space, natural resource areas, and farmland. It says that "SCAG is also developing a natural lands acquisition and open space conservation strategy to encourage large-scale acquisition and management of critical habitat to mitigate impacts..." RCTC also requests that SCAG mention Riverside County's MSHCP accomplishments in section.	Comment noted. The MSHCP effort in Riverside County is an excellent example and has been added to the referenced Environmental Mitigation discussion.
126-07	Anne Mayer	Riverside County Transportation Commission	Page 151, Table 4.4 Transportation Network Actions and Strategies - Another action/strategy listed is "Cooperate with stakeholders, particularly county transportation commissions and Caltrans, to prioritize funding sources for preservation and maintenance of the existing transportation network." RCTC agrees that there is insufficient funding for System Preservation. Each county transportation commission established projects and programs with various ways to fund and implement them. Funding is limited and it would be more beneficial to work with stakeholders in identifying a new funding source or increased funding levels instead of competing with very limited existing fund sources. RCTC suggests that SCAG revise the wording to "... to identify new funding sources and/or increased funding levels for preservation and maintenance..." This recommended change should also be reflected in Chapter 2, Page 39, under System Preservation.	Comment noted. The requested edit has beenmade in the final RTP/SCS.
126-08	Anne Mayer	Riverside County Transportation Commission	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 68.
127-01	Andrea	Riverside	Page 238 Agency RCTC RTP ID 3CR0702: Revise project	Comment noted. We have addressed all modification requests

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	Zureick	County Transportation Commission	description to remove PVL station at Hemet Airport and replace with station near new SR-79 alignment and Stetson Rd.	to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
127-02	Andrea Zureick	Riverside County Transportation Commission	Page 239 Agency RTA RTP ID 3TC04TR6: Change the project description to "Construct new Hemet Transit Center (with approximately 4 bus bays) in the vicinity of State St and Devonshire Ave near the future courthouse location. Change the project location from Menifee to Hemet. Change the completion year from 2027 to 2015, and update the total project cost from $5,926 to $1,442.	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
127-03	Andrea Zureick	Riverside County Transportation Commission	Page 240 Agency RCTC RTP ID 3C01MA03: Change project description to "CETAP – Riverside County to Orange County – Construct new intercounty transportation Corridor A – 2 toll each dir on new facility parallel to SR-91, from from SR- 241 to I-15, with IC at SR-241, SR-71, I-15". Network year remains 2035. Update total project cost to $2,720,000. Move balance of project description "CETAP – Corridor B – 2 toll each dir on new facility from I- 15/Mid-County Pkwy to SR-241/SR-133" to Strategic Projects Section.	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
127-04	Andrea Zureick	Riverside County Transportation Commission	Page 266 Agency Coachella RTP ID 3A07094: This is currently programmed as FTIP ID RIV071246. Network year should remain 2018 (previously requested to change to 2020). Update total project cost from $4,853 to $22,290.	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
127-05	Andrea Zureick	Riverside County Transportation Commission	New Project, RTA: Regional transit center for mass transit service in central western Riverside County along I-215 corridor. Network year is 2030 and the total project cost is $10M.	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the standard RTP long-range project list modification and FTIP database update processes.
127-06	Andrea Zureick	Riverside County Transportation Commission	We would like to request modifications to the project list that we have submitted to SCAG staff through the standard RTP long-range project list modification and FTIP database update processes: Major project modifications have been submitted for the following RTP projects: 3A07262 3A07205 3A07207 3A07024 3A07040 3A07069 3A07088 3120008 3A01CV047A 3A01CV047B 3A01CV049 3A01CV048 3A07074 3A07031 3ITS08 3A01CV123 3A01CV111 3A07018A 3A01CV104 3A01CV105 3A01CV103 3120010 3A01CV060 3A01CV059A 3A01CV061 3A01CV063 3A04A25 3A07266 3A04WT165 3A01CV067 3A01CV068 3A07001 3120014 3A01CV071 3A07101 3A07292 3A01CV076 3A01CV075 3A01WT210 3A04WT187 3A01WT045 3A04WT046 3A01WT218 3A04A22 3A04WT198 3A01CV085	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the 2011 FTIP A24 update process.

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			3A01CV086 3A07097 3A07244 3A07079 3120012 3A04WT078 3M01CV01 3M0715 3M0702 3M01CV03 3M0716 3M0708 3M0722 3TL504 3TR04C 3TR04A, 3TR04B 3ITS09 3TL1507 3TL1607 3TL1107 3TC04TR1 3TC04TR10 3TC04TR6 3TC04TR8 3TC0702 3A01CV098 3120007 3A01CV002 3A04CV113 3A01CV004 3A01CV014 3A07094 3A07164 3A07165 3A01CV017 3A07011 3A01CV018 3A01CV016 3A01CV023 3A04CV027 3A07078 3A07137 3A07029 3120004	
127-07	Andrea Zureick	Riverside County Transportation Commission	Major project additions have been submitted for the following RTP projects: 3120015 RIV111201 3120016 RIV111131 3A04WT198B 3120017 3120018 3120019 3120020 3120021 3120022 3120023 3120024 3120025 3120026 3120027 3120028 3120029 3120030 3120031 3120032 3120033 3120034 3120035 RIV071250B RIV050531 RIV071241	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the 2011 FTIP A24 update process.
127-08	Andrea Zureick	Riverside County Transportation Commission	Major project deletions have been submitted for the following RTP projects: 3A07109 (project complete) 3A04WT070 3A01WT036 (project complete) 3A01WT035 (project complete) 3A07076 3M01WT021 3TK04MA13 (programmed as RIV120201 in 2011 FTIP A24) 3M04WT009 (programmed as RIV091012 in 2011 FTIP A24)	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the 2011 FTIP A24 update process.
127-09	Andrea Zureick	Riverside County Transportation Commission	Major project changes were submitted as part of 2011 FTIP A24: RIV071247 RIV031209 RIV071253 RIV071267 RIV050532 RIV071250 RIV090902 (3M0803) RIV520109 RIV091007 (removed from A24) RIV090622 RIV071252 (3A07020) RIV071254 (3A07022) RIV62034 RIV120201 (3TK04MA13) RIV62029 RIV091008 (3A07131) RIV060111 RIV100107 (3M10WT03) RIV091012 (3M04WT009) RIV100104 (3M0725) RIV060114 RIV110825 RIV031218 RIV080917 (3A07155) RIV080918 (3A07156) RIV031209 RIV050535 RIV120202 (replaced with RIV090902)	Comment noted. We have addressed all modification requests to the project list as submitted by county transportation commissions through the 2011 FTIP A24 update process.
127-10	Andrea Zureick	Riverside County Transportation Commission	Page 83 Agency Lake Elsinore RTP ID RIV091007: This project is not reflected in the Financially- Constrained RTP Projects list – please confirm project is modeled.	Comment noted. FTIP ID RIV091007 cannot be found in the Financially-Constrained Project List because it is programmed off RTP ID 3A04WT047, which is in the Project List. However, RIV091007 can be found in the Model List.
127-11	Andrea Zureick	Riverside County Transportation Commission	Page 90 Agency Palm Springs RTP ID RIV090402: This project is not reflected in the Financially- Constrained RTP Projects list – please confirm project is modeled.	Comment noted. RIV090402 cannot be found in the Financially-Constrained Project List because it is programmed off of REG0704, which is in the Project List. However, RIV090402 can be found in the Model List.
127-12	Andrea	Riverside	Page 243 Agency Riverside County/Indo: Programmed as FTIP ID	Comment noted.

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	Zureick	County Transportation Commission	47520 (I-10/Jefferson IC).	
127-13	Andrea Zureick	Riverside County Transportation Commission	Page 250 Agency Moreno Valley RTP ID 3M0712: Programmed as FTIP ID RIV080902.	Comment noted.
127-14	Andrea Zureick	Riverside County Transportation Commission	Page 251 Agency Moreno Valley RTP ID 3M0801: Programmed as FTIP ID RIV080904.	Comment noted.
127-15	Andrea Zureick	Riverside County Transportation Commission	Page 252 Agency Coachella RTP ID 3M0717: Programmed as FTIP ID RIV071274.	Comment noted.
127-16	Andrea Zureick	Riverside County Transportation Commission	Page 255 Agency RCTC RTP ID 3M0738: Programmed as FTIP ID RIV110122.	Comment noted.
127-17	Andrea Zureick	Riverside County Transportation Commission	Page 272 Agency Moreno Valley RTP ID 3A10WT01: Programmed as FTIP ID RIV091004.	Comment noted.
127-18	Andrea Zureick	Riverside County Transportation Commission	Page 272 Agency Riverside County RTP ID 3A04WT137A: Programmed as FTIP ID RIV090903. Verify that project is modeled.	Comment noted. This project is modeled.
127-19	Andrea Zureick	Riverside County Transportation Commission	Page 280 Agency Moreno Valley RTP ID 3A01WT053: Programmed as FTIP ID RIV080908.	Comment noted.
127-20	Andrea Zureick	Riverside County Transportation Commission	Page 286 Agency Moreno Valley RTP ID 3A04WT056F: Programmed as FTIP ID RIV080915.	Comment noted.
127-21	Andrea Zureick	Riverside County Transportation Commission	Page 287 Agency Moreno Valley RTP ID 3A0805: Programmed as FTIP ID RIV080917.	Comment noted.

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127-22	Andrea Zureick	Riverside County Transportation Commission	Page 291/2 Agency Rancho Mirage RTP ID 3A07116/3A07128: Programmed as FTIP ID RIV091010.	Comment noted.
128-01	Andrea Zureick	Riverside County Transportation Commission	Please see attached comment on the Riverside County project list.	Comment noted.
129-01	Larry Rubio	Riverside Transit Agency	Chapter 2, Pages 49 and 50, under Transit Policies, RTA supports the need for increases in state and federal funding for sustaining the operation of transit services and infrastructure including future BRT and express bus service projects as included in the Draft RTP/SCS. In addition, as our region's population continues to age, increased operational funding support to provide paratransit services will be a continued need moving forward.	Comment noted.
129-02	Larry Rubio	Riverside Transit Agency	Transportation Investments, Chapter 2, Pages 50 and 51, under Passenger and High-Speed Rail, the RTA requests that short term commuter rail service improvements be made in Riverside County. At this time of record ridership growth on RTA's services, these near term improvements would promote further bus and rail integration resulting in region-wide reductions in congestion due to reduced automobile traffic.	Comment noted. The Riverside County Transportation Commission is working to increase service on the 91 and IEOC Metrolink lines.
129-03	Larry Rubio	Riverside Transit Agency	Transportation Investments, Chapter 2, Page 41, under Transportation Systems Management, t he RTA suggests that more emphasis be placed on developing a wider variety of capital funding sources to support and maintain Transit AVL and ATIS. In this time of social media applications, this is highly important in attracting and retaining revenue to support the transit system.	Comment noted. The 2012 RTP/SCS recommends increased investment in real-time passenger information systems, and is discussed in the Transit Appendix.
129-04	Larry Rubio	Riverside Transit Agency	With school districts continuing to lose state transportation funding, the RTA will be expected to provide additional services to schools throughout western Riverside County without the provision of additional operating funds. The RTA desires to work closely with SCAG and other regional agencies to develop funding solutions to accommodate this growing trend.	Comment noted. The RTP supports seeking increased funding for transit services. SCAG will seek to identify regional and local funding solutions and work with transit operators in its region to help fill these potential gaps in the transportation network.
129-05	Larry Rubio	Riverside Transit Agency	Ensure modeled RTA transit projects included in the Draft RTP/SCS are accurately depicted based on system-wide high ridership results in 2011, continued reductions in unimployment	Comment noted.

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			within westenr Riverside County and forecasted gas price changes.	
130-01	Pauline Chow	Safe Routes to School National Partnership	Increase the overall percentage of RTP funds dedicated to active transportation from 1.3 percent of the 2012 RTP to 5-8 percent of the total 2012 plan. The request for 5-8 percent reflects the region's current mode split, collision trends, community interest and support, as well as current bicycle and pedestrian planning and implementation requirements, based on projections by the Los Angeles County Department of Public Health (LAC DPH) Methodology (released 12/2011). The LAC DPH determined in a rigorous study that the unmet regional funding need for a walkable and bikeable SCAG Region was close to $40 billion. This represents roughly 8 percent of the total RTP budget, which is significantly larger than SCAG's proposed $6B to address regional needs. As local governments contribute resources to the construction of active transportation projects, all other funding sources for active transportation, such as the amount of RTP local (county sales taxes and other local revenues included in the 2012 RTP), state, and federal programing dollars, should be increased to aid these efforts. Additional state and federal funding will help cities do more with their local dollars, especially since often local funding is tied into federal funds. As it stands in the draft 2012 RTP, eighty percent of the SCAG funds dedicated to active transportation investments in the 2012 RTP are not programmed until after 2026. Between 2016-2025, the funding for active transportation will be only one-half of the current annual 2012 budget. We encourage SCAG to prioritize active transportation funding and distribute these funds evenly over the 25 year period, which will bring the benefits of active transportation to fruition sooner for all communities. While we encourage SCAG to increase funds to support Active Transportation, we recognize the constraints and importance of working with County Transportation Commissions (CTC's) to fast-track active transportation funding. We request the 2012 RTP include development of an Active Transportation Finance Strategic Plan by 2014 that identifies how each CTC is spending funds and the opportunities available for increasing funding for active transportation in each county during the next ten years.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.

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			This plan ideally is developed by convening a Regional Active Transportation Early Action Transportation Program in which SCAG brings together each County Transportation Commission (CTC), elected officials and other stakeholders to discuss and prioritize what each County is doing regarding active transportation and funding areas which may be leveraged for the needed funding, for walking and bicycling and first mile/last mile projects, in the earlier stages of the 2012 RTP. We request that this Early Action Program have be adopted and include a 2014 implementation plan. We have seen tremendous - and still growing - support and action from throughout the six-county region calling for policy makers to support and build walkable and bikeable neighborhoods. We encourage SCAG leaders to respond by supporting the impressive efforts underway throughout the region to create healthy and active communities for all.	
130-02	Pauline Chow	Safe Routes to School National Partnership	Allocate Funding for Bicycle and Pedestrian Planning and Usage Counts: Improving the walking and biking environments in our region cannot be done without adequate planning at the local level. Unfortunately, many SCAG cities do not have bicycle or pedestrian master plans and project lists; in Los Angeles County, for example, only approximately 11 of 88 cities have bicycle master plans and only 4 cities have pedestrian plans. This lack of planning is a grievous impediment to improving infrastructure for cyclists and pedestrians. In addition, we must increase documentation of bicycle and pedestrian travel usage and demand by regularly assessing numbers of people walking and biking. Without such figures, it is difficult to forecast mode share and usage or measure the positive benefits of investments in these modes. ● Identify funding sources in order to set aside at least $19M in the 2012 RTP to support SCAG cities in developing bicycle and pedestrian master plans, safe routes to school plans and required, but overdue ADA transition plans. It is estimated that approximately $200,000 per city is required to develop these plans (95 cities at $200,000). Establish a goal of 50 percent of SCAG cities having completed at least one plan by 2016 in order to prepare for the 2016 RTP. ● Create and fund a regional bicycle and pedestrian count program at SCAG establishing yearly usage counts at key	Comment noted.

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			locations in cities throughout the SCAG region. Use the data collected to establish trends, set performance goals, evaluate fund requests for facility improvements, prioritize improvements, and show the impacts of recent improvements. Set aside funds in SCAG's 2012/2013 OWP to create program and maintain this program in future years. (See links: Nashville Metropolitan Planning Organization's program, Technical Memorandum on Regional Pedestrian and Bicycle Count Procedures)	
130-03	Pauline Chow	Safe Routes to School National Partnership	Adopt a Regional Complete Streets Plan by 2014: This plan will incorporate input from local jurisdictions to prioritize complete streets projects in programing efforts and dedicate a portion of system preservation and maintenance funding for improving the road conditions of all users.	Comment noted. Goal 3: Increase Active Transportation Usage in the SCAG Region, Objective 3.2 Adoption of a Complete Streets Policy includes two policies 1) Encourage local jurisdictions to prioritize and implement projects/policies to comply with ADA requirements; and 2) Encourage local jurisdictions to develop and implement Complete Streets Policies.
130-04	Pauline Chow	Safe Routes to School National Partnership	Adopt a Safe Routes to School Regional Strategic Plan by 2014: Such a plan would be similar to the plan currently being adopted by SANDAG. In our region 14 percent of all morning congestion is caused by private car drop off at schools (Traffic Injury Prevention, August 2011). It is critical that transportation agencies look at the needs of the entire network when planning resource investments. SANDAG's Regional Safe Routes to School Strategic Plan works to establish a critical needs assessment for their Region on how students and their families currently go to and from school, creates data standards and guidelines, considers school siting and closures as possible land use strategies, bridges the gap between transportation planning agencies and school districts, and works to provide much needed technical assistance to local jurisdictions - with skill sets such as how to obligate federal Safe Routes to School funds in a timely manner.	Comment noted. Goal 3: Increase Active Transportation Usage in the SCAG Region, Objective 3.1 Adoption of a Safe Routes to School Policy includes three policies 1) Enable and encourage children; including those with disabilities to walk and bicycle to school; 2) Make bicycling and walking to school a safer and more appealing transportation method, thereby encouraging a healthy and active lifestyle from an early age; and 3) Facilitate the planning, development, and implementation of project and activities that will improve safety and reduce traffic, fuel consumption, and air pollution in the vicinity (approximately 2 miles) of primary and middle schools (Grade K-8).
130-05	Pauline Chow	Safe Routes to School National Partnership	School Siting and Joint Use Policies as land use elements of the SCS: School siting can often determine whether or not it is possible for children to walk and bicycle to school. When schools are placed on the outskirts of urban areas it becomes necessary for children to be driven to school. As noted above, 14 percent of all morning congestion is caused by private car drop off at schools (Traffic Injury Prevention, August 2011). Therefore schools should be located within residential	Comment noted. The Final 2012 RTP/SCS has been updated to address comment. See Table 4.3 Land Use Actions and Strategies.

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			neighborhoods whenever possible and equitable to reduce congestion and increase opportunities for bicycling and walking. Joint Use Policies allow school facilities such as playgrounds and recreational facilities to be used by the community when schools are not in session. This can open up recreational activities in neighborhoods that lack parks and open spaces. When schools are located within neighborhoods, community members can access these locations without the use of a private automobile which can lead to further reductions in congestion.	
130-06	Pauline Chow	Safe Routes to School National Partnership	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.	Comment noted. The Safety Appendix of the RTP/SCS lists various goals and strategies designed to reduce the number of transportation fatalities in the region. Other goals and strategies designed to increase active transportation and improve quality of life are expected to increase the overall regional health benefit.
130-07	Pauline Chow	Safe Routes to School National Partnership	Monitoring detailed population data and metrics in environmental justice communities: The analysis conducted by SCAG in the Environmental Justice Supplementary Report ("EJ Supp. Report") provides detail on existing inequities in all modes of transit, housing, employment, environmental impacts, and health risks. The historical analysis in the Environmental Justice Supplementary Report confirms the challenges faced by the environmental justice population, as defined by SCAG: ○ longer commute times and distances than average, ○ vulnerability to gentrification and displacement from high quality transit areas (HQTA) or transit oriented communities (TOC), ○ higher proportional use of non-automobile travel, such as bus, rail, walk, and bicycle, and growth patterns concentrated within geographies of poor quality transit, lower housing costs, and fewer employment opportunities. Concerns arise in the inconsistencies of the environmental justice analysis. SCAG's analysis of travel time and travel distance savings shows "fairly similar and close" rates for all ethnic groups, including non-white Hispanics. Yet, the increase	Comment noted. (1) SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. Trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering . (2) SCAG is continuing to monitor and track place-based development/growth and any associated environmental and safety indicators for future Environmental Justice studies. In previous Regional Transportation Plans (RTP) as well as for this Plan, hot spots of emissions and noise concerns are identified, presented, and mapped in the Environmental Justice Appendix. SCAG will take the comment and suggestion into consideration to expand its existing efforts and establish a region wide monitoring program to focus on selected environmental justice areas and communities of concern. (3) SCAG is currently in the process of enhancing our Sustainability Tool (ST) by developing parcel and Census tract based land use and built environment data that

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			of transportation and infrastructure projects in HQTA/TOC will increase gentrification and displacement of environmental justice populations. The forecasted benefits for environmental justice populations are likely negated or overridden by predicted geographical shifts. In order for SCAG to properly mitigate disparities in transportation, housing, and land use impacts in low-income and minority communities, it must monitor population changes by more detailed population segments (i.e. neighborhoods, census tract) because root factors of inequities play out at these population segments. It is difficult to illustrate short-term impacts and long-term benefits on the environmental justice population without such details. For example, the continued poor job housing fit and balance in the SCAG region leave lower-income populations with no public or active transportation options in their daily commute. Metrics need to demonstrate immediate changes to transportation usage from ticket pricing, placement of rapid bus transit stops in high concentrations of lower-income and elderly groups, and safety programs for walking and bicycling. (see link: Health Equity and Prevention Primer, Prevention Institute) Additionally, SCAG should provide the tools and policies for local jurisdictions to develop strategies to reduce commute distances and relieve sedentary lifestyles for lower income and communities of color. Healthy, sustainable, and accessible place-making is crucial to the environmental justice population because geography and socioeconomic structure are influential predictors of obesity in the United States. Environmental justice populations must be ensured the opportunity to go to school, live, work, and play in all neighborhoods through land use strategies, incentives for businesses and developers, infrastructure and non-infrastructure programming, such as Complete Streets, first/last mile to transit, density bonus, parking reductions, safe and secure bicycle parking and street crossings, and affordable and work force housing in HQTA/TOC. (see link: Why Place & Race Matters, Policy Link) SCAG does not adequately link RTP/SCS active transportation funding to its environmental justice obligations. The lack of active transportation funding disproportionally affects immigrant, lower-income, and minority	correlate to confidential health survey information obtained from the Los Angeles County, Department of Public Health. SCAG anticipates completing this work for the enhanced ST prior to the next round of Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS) in 2016. In order to enhance our efforts in tabulating the health impacts for residents in the region and to assist local jurisdictions in better understanding the linkages between the built environment and community health, SCAG's current planning and research effort is to enhance the Sustainability Tool (ST). The process will begin by refining the tool's base data on the built environment, and through collecting information for the following areas (1) health outcomes, (2) safety - pedestrian & bike accidents and injuries, (3) emissions (PM, CO, CO2, NOx, Ozone) and air quality (dispersion), (4) energy usage (electricity & gas), (5) water usage, (6) water quality (total maximum daily loads - TMDL), (7) Vehicle Miles Traveled (VMT) and accessibility, (8) various environmental indicators (such as pollutant information available from the US Environmental Protection Agency's Toxics Release Inventory (TRI)). Once this information is obtained, staff can conduct a correlation and modeling analysis to link the built environment and determinants (road, freeway, transit, school, hospitals, etc., buildings, design, fast food and or healthy food access, park, open space, walk/bike ways) with the environmental outcomes listed above. So far, SCAG staff has obtained health data from Los Angeles County Department of Public Health, parcel level gas and electricity consumption data, and water consumption data for certain localities. We anticipate there will be many collaborations and technical exchanges with stakeholders in various policy areas with the aim of reaching consensus on recommended approaches in this effort and best practices for the use of the tool.

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			populations because these neighborhoods have greater barriers to physical activity and transit access, higher numbers of busy regional arterial, poor pedestrian and bicycle infrastructure, unsafe neighborhoods, and lack of safe storage for bicycles and safe crossings. Thus, these neighborhoods would benefit from an increase in funding allocations (in order for SCAG to meet its Title VI obligations) and from a detailed strategic plan. (see links: Do All Children Have Places to Be Active, Active Living Research; Low Income Resource Guide, Safe Routes to School National Partnership)	
131-01	Rye Baerg	Safe Routes to School National Partnership	When we get to the 2016 RTP, in four years, I want to see us have strong, solid, ground work for active transportation. I want SCAG to do some really strong regional planning. I want Staff to work with the CTC's to make sure that we know the numbers that are out there, we have the strong funding sources available so than when we get to this process again in 2016 we are adequately prepared for that.	Comment noted.
132-01	Pauline Chow	Safe Routes to School National Partnership	Per 2009 National Household Travel Survey, 21 percent of all trips in the SCAG region are currently being done via walking and bicycling.	Comment noted.
132-02	Pauline Chow	Safe Routes to School National Partnership	And tragically, per SCAG 2012 Draft RTP, 25 percent of all roadway fatalities in the SCAG region are pedestrians and bicyclist.	Comment noted.
132-03	Pauline Chow	Safe Routes to School National Partnership	The RTP/SCS provides 1.3% of its funding to active transportation. 80% of the 1.3% funding - 6 billion dollar - is not funded until after 2025. Communities will not see the benefits of walking and bicycling to school, work, and play for at least 13 years.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates. SCAG cannot unilaterally change the near term commitments

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				that are already in place. Significant increase in funding for active transportation proposed in the 2012 RTP/SCS is largely predicated on additional revenues from new sources that will require future actions at the state and/or federal levels. Therefore, the plan realistically assumes that these funds will not be available in the near term. The earliest these funds are expected to be available is 2026.
132-04	Pauline Chow	Safe Routes to School National Partnership	I am a resident of Upland, San Bernardino County, CA and enjoy using the Pacific Electric Trail and Bike lanes, where they exist. However, safety for pedestrians and bicyclists in my city is a huge problem. The last couple of mile to my destination from the Pacific Electric Trial is where I feel unsafe and a target for injury....or even death. This region has great resources and with a little more effort, it can develop the infrastructure for adequate active transportation. Regards, Pauline Chow, Esq. Southern California Regional Policy Manager Safe Routes to School National Partnership	Comment noted.
133-01	Larry McCallon	San Bernardino Associated Governments	The RTP/SCS growth forecasts should be adopted at the County-level, not at the city or 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.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
133-02	Larry McCallon	San Bernardino Associated Governments	The growth distribution at the 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.	Comment noted. The comment is noted. SCAG has incorporated into the final dataset the TAZ- level distribution submitted by SANBAG.
133-03	Larry McCallon	San Bernardino Associated Governments	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.	Comment noted. The proposed alignment for the East-West Freight Corridor included in the 2012 RTP envisions that the facility would continue from SR-60 northerly on the I-15 and terminate just to the north of I-10. Final maps and model networks will reflect consistency with the text.
133-04	Larry McCallon	San Bernardino	We would like to request modifications to the project list, as submitted to SCAG staff through the standard RTP long-range	Comment noted. SCAG has addressed all modification requests to the RTP Project List as submitted by county transportation

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		Associated Governments	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 [refer to letter for details].	commissions, including SANBAG, through the standard RTP long-range project list modification and FTIP database update processes.
133-05	Larry McCallon	San Bernardino Associated Governments	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 84.
134-01	Robert Scott	San Fernando Valley Council of Governments	SCAG is to be congratulated on the production of this unprecedented draft document that does laudable job of combining a Regional Transportation Plan and the inaugural "Sustainable Communities Strategy." The San Fernando Valley Council of Governments represents the San Fernando and Santa Clarita valleys, a metropolitan region of over two million—more populous than 15 states, and one of the largest unified regions in the United States. Until now, we have not always had the opportunity to fully participate in SCAG planning activities as a region. We welcome this opportunity. Because of the shortness of time, we will be unable to submit a full and substantive reply by the end of the public comment period on February 14, 2012. We note that SCAG's regional transportation modeling area covers the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. This modeling area is divided into 11,267 Transportation Analysis Zones (TAZs). Unfortunately, the TAZ maps were only made available on January 26th of this year. There has been very little time for meaningful analysis.	Comment noted.
134-02	Robert Scott	San Fernando Valley Council of Governments	The City of Los Angeles and other respondents have noted that the plans tend to be inconsistent with existing Community Plans and General Plans. This could result in confusion, cost and needless litigation. We would like to reserve the opportunity to comment further as the process continues to unfold. Substantive points have been raised by several credible groups. Given the significance of the RTP/SCS, we must approach this task with care, and the issues raised by SCLC, OCBC and the City of Los Angeles, inter alia, certainly bear further, and more detailed discussion.	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region, local jurisdictions maintain local land use authority.
134-03	Robert Scott	San Fernando Valley Council of	Further consideration is needed on "Policies and Principles of a Sound RTP/SCS" as stated: 1. Provides Positive Economic Impacts … A Plan that is pro economic growth and job creation	Comment noted. The Economic and Job Creation Analysis Appendix to the final RTP/SCS has been updated to provide a more comprehensive assessment of the benefits and impacts of

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		Governments		the 2012 RTP/SCS.
134-04	Robert Scott	San Fernando Valley Council of Governments	2. Provides Local Control … A Plan that honors local control and flexibility over land use and transportation	Comment noted. This RTP/SCS recognizes local control and flexibility over land use and transportation decisions in this region.
134-05	Robert Scott	San Fernando Valley Council of Governments	3. Assures New Revenue Sources are Fair, Equitable and Economically Sound	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
134-06	Robert Scott	San Fernando Valley Council of Governments	4. Is Balanced and Accountable	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system,

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				recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
134-07	Robert Scott	San Fernando Valley Council of Governments	As a matter of process, it is recommended as follows: • Extend the public comment period to allow a more full and fair discussion of the issues.	Comment noted. We apologize that the comment period could not be extended primarily due to schedule constraints dictated by deadlines for SCAG to meet federal transportation conformity requirements.
134-08	Robert Scott	San Fernando Valley Council of Governments	• Create an Issue Matrix of all recommendations to allow easier reference, for discussion and resolution. • Share the Issue Matrix, including pros and cons with all subregions, COGs, stakeholders and the Regional Council.	Comment noted. SCAG has utilized this RTP Comments and Responses matrix as part of the final RTP/SCS document for the purpose of discussing and resolving comments received.
134-09	Robert Scott	San Fernando Valley Council of Governments	• Highlight controversial issues for detailed discussion and consensus building.	Comment noted.
134-10	Robert Scott	San Fernando Valley Council of Governments	• Seek strategies that emphasize empowerment and incentives rather than compliance and regulation.	Comment noted.
134-11	Robert Scott	San Fernando Valley Council of Governments	• Set forth overarching disclaimers [local jurisdictions' reservation of rights] to clarify what the RTP/SCS is not. Focus on the legal implications of the RTP/SCS and PEIR.	Comment noted. The 2012 RTP/SCS states that under SB 375, a jurisdiction's land use policies and regulations need not be consistent with the RTP or SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose and generally includes the quantitative growth projections from each city and county in the region , local jurisdictions maintain local land use authority.
134-12	Robert Scott	San Fernando Valley Council of Governments	• Reconcile reduction in greenhouse gases (GHG) with loss of gas tax revenues.	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP, including sources based on consumption of gasoline. As is noted in the Plan, gas tax revenues have lost purchasing power due to changes in CAFE standards, adoption of hybrid and electric vehicles, and lack of update to the gas excise rates. Improved vehicle fuel efficiency is associated with reduced greenhouse gas emissions per mile traveled.
134-13	Robert Scott	San Fernando Valley Council of Governments	• Provide outreach and public information that contains standardized references, metrics and common denominators—materials that can be readily understood by local leaders, constituents and the consuming public.	Comment noted. SCAG will consider this comment in assessing its outreach activities to ensure that information presented to local leaders and the public is both informative and understandable.
134-14	Robert Scott	San Fernando	• Emphasize the economic realities of existing transportation	Comment noted. The RTP/SCS describes the economic realities

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		Valley Council of Governments	systems, and explain the need for, and alternatives for future improvements.	of our existing transportation systems, including the lack of a sustainable funding source and uncertainty in future funding from federal and state sources for both the highway and transit system. The strategies of this RTP/SCS then build on this understood reality with user fee-supported transportation systems and the assumption that a sustainable transportation funding source will need to be implemented in order to maintain and improve our existing and proposed transportation systems.
134-15	Robert Scott	San Fernando Valley Council of Governments	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 71.
135-01	Carolyn Casavan	San Fernando Valley Green Team	It is apparent that a great deal of time and effort have gone into the preparation of the Draft 2012-2035 RTP/SCS and the interactive version provided on the website provides an excellent format for the community to access and comment on the plan. That being said, this is the first time that we are seeing all of this work pulled together and we believe that the public needs more time to effectively comment on the plan. We strongly recommend extending the comment period by 30-60 days. The following are our initial comments regarding the Draft 2012-2035 RTP/SCS. A more thorough analysis and response will be prepared if the comment period is extended.	Comment noted. The 55-day formal review and comment period for the Draft 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy concluded on February 14, 2012, and this process complied with applicable federal and state requirements. During the last two years, SCAG staff engaged in extensive outreach activities and consultation with the regional stakeholders, including cities, counties, transportation commissions, air districts, and other representatives from the private and public sectors, in the development of the draft RTP/SCS documents. SCAG apologizes that the comment period could not be extended primarily due to schedule constraints dictated by deadlines for SCAG to meet federal transportation conformity requirements.
135-02	Carolyn Casavan	San Fernando Valley Green Team	Increase investment in and give higher priority to mass transit projects, especially local projects that improve the accessibility, frequency, and convenience of public transportation for getting around within and between local cities. As can be seen from the Orange and Red Lines, people will use public transportation that meets these standards. We need more projects that reach more locations. We need to increase the capacity of existing projects, such as the Orange Line, to meet growing demand. And we need to improve access to other projects such as the Red Line.	Comment noted. The RTP includes an increase in transit capital and operating funding.
135-03	Carolyn Casavan	San Fernando Valley Green Team	Focus funding for highways and streets on maintenance rather than expansion. It is better to reach our goals through reductions in vehicle miles traveled (VMT) than through expansion of vehicle access. We don't even have enough money to maintain our existing streets and highways. Why would we	Comment noted. The RTP/SCS identifies more funding for highway preservation than in past RTPs, including $56.7 billion for highway operations and maintenance through 2035, and $20.9 billion for local streets and roads.

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			add more lane miles to these conditions? Let's focus on improving what we have before building more.	
135-04	Carolyn Casavan	San Fernando Valley Green Team	Integrate transit stops and bicycle racks/storage with local communities. Consider multi-use parking facilities that accommodate complementary parking needs, such as transit and high density residential. Enhance linkages between transit stops and nearby commercial districts. Considered preferred parking at rail stations for carpool and/or vanpool.	Comment noted. The 2012 RTP/SCS includes a significant investment in Active Transportation facilities, including first/last mile projects.
135-05	Carolyn Casavan	San Fernando Valley Green Team	Develop tourism and entertainment oriented transit. Provide rail service between cities and tourism destinations with weekend schedules that enable day and weekend trips (i.e., early morning and evening service). Configure bus routes and transit schedules on weekends to connect restaurant and entertainment districts in the City of Los Angeles and enhance these linkages with shuttle and pedicab services between transit stops and entertainment districts, such as between the North Hollywood transit station and the nearby North Hollywood commercial district.	Comment noted. The RTP includes new transit services and an increase in existing ones that will increase service to tourism and entertainment destinations.
135-06	Carolyn Casavan	San Fernando Valley Green Team	Change the mileage based fee for vehicles to a GHG based fee collected as part of the vehicle registration process. Paying this fee as part of registration rather than as fuel taxes, raises individual awareness of vehicle related GHG emissions and the fee can be tiered to further incentivize fuel efficiency and reduced VMT. The fee can be based on vehicle miles traveled times the miles per gallon rating of the vehicle to determine GHG emissions. For many automobiles the actual gas usage is already available in their navigation systems. For others, vehicle mileage can be reported annually and trued up at time of sale.	Comment noted. SCAG will consider your recommendation as part of our subsequent work on potential implementation issues for the mileage-based user fee.
135-07	Carolyn Casavan	San Fernando Valley Green Team	Increase funding for Active Transportation, First Mile/Last Mile, and Transportation Systems Management.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff

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				will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
135-08	Carolyn Casavan	San Fernando Valley Green Team	Determine the cost effectiveness of high-speed rail relative to GHG reduction, congestion reduction and number of passengers served and compare to the cost-effectiveness of other transit projects. Set a standard for cost-effectiveness and design projects to meet this standard or withhold funding.	Comment noted. The California High-Speed Train 2012 Business Plan contains a cost/benefit analysis of the project.
135-09	Carolyn Casavan	San Fernando Valley Green Team	Set a goal to reduce vehicle miles traveled within the region rather than facilitating driving.	Comment noted. A reduction in VMTs is a major goal of the RTP.
135-10	Carolyn Casavan	San Fernando Valley Green Team	Plan for the retention and expansion of manufacturing capabilities in the region. Local manufacturing is a critical component of sustainability. It is essential to providing good paying jobs for skilled workers and supports the regional economy by retaining capital in the community and contributing to a more stable tax base, it reduces GHG emissions resulting from transportation related to importing goods from overseas, it showcases the resources and skills of the region, and it stimulates innovation by providing an outlet for new ideas. The purchase of regional materials/labor is good for the economy and good for the environment. Encourage this type of development by enhancing rail transit to and from local manufacturing centers, protecting industrial areas from encroachment of incompatible land uses and developing strategies to facilitate the growth of sustainable local manufacturing.	Comment noted. SCAG has collaborated and worked closely with business leaders throughout the development of the 2012 RTP/SCS. For example, the Global Land Use & Economic Council with representatives from private sectors including Southern California Leadership Council, LAEDC, Orange County Business Council and Inland Empire Economic Partnership developed an Economic and Job Creation Strategy and was adopted by SCAG's Regional Council in June 2011. One of the Strategy's emphases is on retaining and creating manufacturing jobs and ensuring the policies and investment land use strategies recommended in the 2012 RTP/SCS will facilitate the growth of manufacturing jobs and serve manufacturing clusters/centers in the region.
136-01	Angel Carrillo	San Gabriel Valley Council of Governments	As its Governing Board meeting on February 16th, the San Gabriel Valley Council of Governments (SGVCOG) Governing Board adopted a position of "support" for the above mentioned alternative for the SCAG Draft 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The draft RTP/SCS includes four alternatives. The San Gabriel Valley Council of Governments supports Alternative B as this Alternative best addresses future transportation needs and anticipated changes associated with future growth.	Comment noted.
137-01	Cynthia Kurtz	San Gabriel Valley Economic Partnership	The Partnership supports the Gold Line Foothill Extension the Montclair as a part of the RTP constrained plan. The Partnership supports the completion of the Alameda Corridor East in the constrained plan. America Fast Forward (30/10 initiative) addresses the need for improving the Los Angeles County	Comment noted. Regarding the recommendation to include carpool lanes on I-10 from SR-57 to downtown Los Angeles, please note that projects #LA000548 and #LA0B587 are included in the RTP and when completed, will provide continuous carpool lanes from SR-57 to downtown Los Angeles.

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			transportation infrastructure quickly. Specifically, projects that the Partnership continues to support that are included in the 30/10 initiative are the Goldline Eastside Extension SR 60 alignment as well as the Goldline Foothill Extension, and the Regional Connector. We support leveraging the voter approved Measure R funds to complete the above projects in an expedited manner. The Partnership supports SCAG evaluating the impact of using funds earmarked for High Speed Rail to improve the current regional Metrolink service. Highway 71 in Pomona is a bottle neck point in the San Gabriel Valley. The Partnership supports SCAG in their plan to change the highway from an expressway to a full freeway between I-10 and SR-60 with the addition of 1 mixed flow lane and 1 HOV lane in each direction as part of the constrained plan. The Partnership recommends the RTP include carpool lanes on the I-10 Freeway from Route 57 to downtown Los Angeles.	
137-02	Cynthia Kurtz	San Gabriel Valley Economic Partnership	• Adding express bus service as a part of the proposed High Occupancy Toll Lanes network is imperative if the project is to be successful. Additionally, we ask SCAG to evaluate the Metro Express Lanes Project before committing to a regional High Occupancy Toll network.	Comment noted. We agree that the regional Express/HOT lane network could prove much more successful with the integration of express bus service. We likewise agree that an evaluation of the Metro Express Lane demonstration project should be a critical input on subsequent development of the regional Express/HOT lane network.
137-03	Cynthia Kurtz	San Gabriel Valley Economic Partnership	• Addressing increased east west truck traffic in the San Gabriel is important. However, the East West Freight Corridor proposed in the RPT has not had sufficient public input. Many of our member cities are opposed to the project as they understand it today. We ask that SCAG take the time necessary to consult with the community before moving forward.	Comment noted. SCAG has provided significant opportunities for input to the 2012 RTP/SCS. This included, but was not limited to, the SCAG RTP/SCS website, policy and committee meetings, a series of eighteen public workshops held during Summer 2011, and eighteen additional workshops and public hearings held following the release of the Draft 2012 RTP. These workshops were held in every county in the region to solicit input from various interests such as residents, elected officials, representatives of public agencies, community organizations, and environmental, housing and business stakeholders. (Please see the SCAG RTP Public Participation Plan at http://www.scagrtp.net/content?c=06.) However, SCAG will continue to work with partners and stakeholders following the adoption of the 2012 RTP/SCS. Additionally, SCAG presented information on the 2012 RTP/SCS and the East-West Freight Corridor to the San Gabriel Valley Council of Governments Transportation Committee and Governing Board, and its membership, on several occasions. The San Gabriel Valley

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				Council of Governments have recently taken action to support SCAG staff recommendations for the 2012 RTP/SCS. SCAG also conducted considerable outreach to cities in the San Gabriel Valley adjacent to the proposed East-West Freight Corridor. SCAG intends to continue to work with regional stakeholders, including cities of the San Gabriel Valley, on the proposed East-West Freight Corridor.
137-04	Cynthia Kurtz	San Gabriel Valley Economic Partnership	The Partnership recognizes that declining gas tax will impact the maintenance of our highway system unless alternative revenue sources are available. We support studying evaluating other revenue options including one based on vehicle miles traveled to replace gas tax. However, we are aware that other agencies are evaluating new transportation fees as well such as the traffic mitigation fee proposed by METRO. During these difficult economic times, any new tax or fee could result in additional job loss. Economic impacts need to be considered before asking voters for any additional transportation funding.	Comment noted. We agree that additional work is needed before the mileage-based user fee would become effective which is basis for assumption that implemention would begin after 2025. The projected revenue from the mileage-based user fee and adjustments to state and federal gas excises taxes when combined with the core revenue forecast for state and federal sources generate less revenue than the historical average increase in state and federal transportation revenues sources of five percent annually. Rather than simply assume a continuation of the historical growth rate, which is consistent with federal requirements, we detailed specific steps necessary to stabilize state and federal transportation revenue sources consistent with recommendations from two national commissions established by Congress through SAFETEA-LU. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users. The financial plan does not assume any revenues associated with the congestion mitigation fee feasibility study currently being explored by Metroas a part of a proposed restructuring of its Congestion Management Program.
138-01	Kim Floyd	San Gorgonio Sierra Club	We are pleased to see an advanced mitigation component in the Draft 2012 RTP/SCS. This is an excellent first step to creating a program that thoughtfully mitigates impacts to our natural environment from transportation projects. As you know, Orange County and San Diego have similar programs that have met great success. By incorporating this strategy into your policy document, the many benefits of this large-scale conservation approach will be realized. Thank you for your leadership.	Comment noted.
138-02	Kim Floyd	San Gorgonio	Under the Endangered Species Act, the United States Fish and	Comment noted. The proposed conservation strategy will

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		Sierra Club	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."	pursue a strategic planning process for identifying open space resources among a wide variety of stakeholders. The intent is to include all applicable protected areas. Language has been clarified.
138-03	Kim Floyd	San Gorgonio Sierra Club	On page 78 of the Draft 2012 RTP/SCS, the document mentions the 2008 Regional Comprehensive Plan that inventoried protected and unprotected areas in relationship to wildlife linkages, linkage designation areas, park and recreation areas. We were pleased that SCAG completed this Plan showing what areas are protected and critical to maintaining functioning habitat reserves. We agree that the planning efforts SCAG undertakes in the future should involve updating the maps, but recommend expanding the language in this section to include all forms of protected lands. By limiting the acquisition and management opportunities of conservation lands to just Natural Communities Conservation Plan (NCCP) or Habitat Conservation Plan (HCP) areas, decisions about priority conservation areas will be misinformed. In fact, it no longer demonstrates a comprehensive plan because of the limited scope (of pre-established mitigation sites, which are likely unrelated to transportation projects). Protected areas (e.g., National Forests, State Parks, Regional Parks, etc.) not in an NCCP/HCP are excluded from the big picture, yet they have extensive benefits to the entire open space system and often times link important habitat areas throughout the region. Consequently, we recommend having this updated map and mitigation site locations expanded to include more than just NCCP/HCP areas and instead include all levels of protected lands (federal, state, regional, and local).	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, not just NCCP/HCP areas, based on input from a wide variety of stakeholders. Language has been clarified.
138-04	Kim Floyd	San Gorgonio Sierra Club	On page 79 of the Draft 2012 RTP/SCS, we were encouraged to see SCAG recognize the benefits of reducing transportation impacts to sensitive lands and encouraging smart land use	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife

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			decisions. We believe landscape level advanced mitigation will become a statewide planning policy. Planning future transportation projects with a comprehensive mitigation program ensures our open space infrastructure can continue to function and maintain viable habitats, linkages, and species populations in perpetuity. Unfortunately, we noticed the lack of inclusion of wildlife linkages in this section. Orange County's transportation measure language included wildlife linkages and we recommend SCAG include linkages as well. We appreciate SCAG's effort to create a strategic planning process that would document important conservation lands in the region. We believe there is an important opportunity with this concept to also create a Southern California Greenprint. By completing a Greenprint a comprehensive view of our open space land attributes would be documented. Such attributes include: recreation priorities, agricultural lands, scenic values, historic preservation, and more. A Greenprint would give a more complete picture of both opportunities and challenges, while at the same time respecting property rights.	crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. A Greenprint is one possible option for the mitigation program that will be discussed with a wide variety of stakeholders.
139-01	Jerry Paresa	San Manuel Band of Mission Indians	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 73.
140-01	Elizabeth Cheadle	Santa Monica Mountains Conservancy	Avoidance of Growth in Resource Areas The RTP/SCS generally steers growth toward more compact forms in already urbanized areas, making efficient use of existing infrastructure and reducing impacts to resource lands. The policy decisions contained within the SCS are projected to save 408 square miles of nonurban land over the life of the plan. If realized, these gains are certainly an achievement, although there is no projection of where this growth will not occur and what mechanisms will preserve the land in perpetuity. The lack of specificity makes it difficult for the Conservancy to evaluate the impacts of the proposed plan. While the projections are intended to be a meta-analysis of regional economic trends rather than a location-specific analysis of growth patterns, SCAG is clearly making assumptions about where development on resource lands is and is not appropriate. This process is not transparent. For example, the Regional Housing Needs Assessment (RHNA) assigns population targets for different	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. The RTP/SCS is a regional plan based on extensive collaboration to obtain local input. SCAG's SCS is based upon local input from local jurisdictions, along with voluntary local actions to increase transit oriented developments SCAG has maximized available discretionary resources to augment the Compass Program, which provides grants to municipalities who seek to voluntarily achieve sustainable communities. SB 375 legislation does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The growth and land use assumptions for the

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			subareas of the region, which are then used to justify additional development whether or not it is consistent with stated goals to encourage compact development within existing urban areas. Newhall Ranch has used the RHNA targets as the basis for its massive expansion into open space areas west of Santa Clarita, resulting in unmitigable habitat and connectivity loss. At least Newhall Ranch is contiguous with the existing Santa Clarita urban area. SCAG appears to endorse the proposed Centennial development at Tejon Ranch by projecting housing demand in the area--no doubt a self-fulfilling prophecy--despite flagrant inconsistency with SCS objectives. These decisions serve as the basis for urbanization of resource lands, yet are not made in consultation with resource agencies. With the understanding that land use authority belongs to local jurisdictions, a truly comprehensive regional plan would transparently set growth parameters in concert with resource conservation goals to eliminate these apparent contradictions. Projecting growth in resource areas sets in motion policies that induce that growth; therefore great care must be taken to ensure such growth meets regional objectives.	RTP/SCS are proposed to be adopted at the jurisdictional level.
140-02	Elizabeth Cheadle	Santa Monica Mountains Conservancy	Wildlife Crossings of Transportation Facilities The Conservancy 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	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. As part of conservation strategy, SCAG, in consultation with regional stakeholders, may pursue additional connectivity research, which could be incorporated into the 2016 RTP. SCAG looks forward to working with the Santa Monica Mountains Conservancy on future planning efforts.

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			indicator species are able to safely move about their environment. The Conservancy has partnered extensively with the National Parks Service, U.S. Geological Survey, and UCLA to research movement corridors in Southern California, with an emphasis on our core jurisdiction in the Santa Monica Mountains, Simi Hills, Santa Susana Mountains, San Gabriel Mountains, and Verdugo Mountains. While much has been learned about movement patterns in these areas 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.	
140-03	Elizabeth Cheadle	Santa Monica Mountains Conservancy	Environmental Mitigation Program SCAG has identified the need for a regional Natural Lands Acquisition and Open Space Conservation Strategy to protect remaining resource lands and mitigate for impacts from transportation improvements. The Conservancy looks forward to working with SCAG on the development of such a strategy. In addition to mitigation banking, transfer of development rights, and payment of in-lieu fees, the Conservancy recognizes conservation easements as a powerful preservation tool for habitat areas. Conservation easements should be listed in the plan alongside the other preservation mechanisms. The Conservancy has supported the establishment of transfer of development rights (TDR) programs in multiple updated general plans as a potentially useful market-based preservation mechanism that supports regional density goals. SCAG should take a leadership role in setting guidelines and best practices for these new county and municipal programs as well as explore the creation of a regionally unified TDR program.	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include applicable protected areas, based on input from a wide variety of stakeholders. Conservation easements and TDR programs are possible options for the mitigation program that will be discussed with the stakeholders, including members of SCAG's Regional Council.
140-04	Elizabeth Cheadle	Santa Monica Mountains	River Parkways and Active Transportation As mentioned previously, the Conservancy is interested in urban river projects	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation

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		Conservancy	for their multiple recreational, environmental, and transportation benefits. The RTP/SCS should fully fund build-out of these active transportation corridors throughout the region. When well designed, these facilities serve as "bicycle freeways" connecting various parts of the region with uninterrupted travel for nonmotorized users. For this reason, the Los Angeles River trail featured prominently in the "Carmageddon" race between Jet Blue and a group of elite bicyclists from Burbank to Long Beach. Separated from traffic, such facilities are also inviting for bicyclists of all ages and abilities, which is necessary to attract substantial mode share away from automobiles. The draft Los Angeles County Bicycle Master Plan, among others, calls for build-out of the river trail system and includes preliminary cost estimates. The RTP/SCS calls for $6 billion over the next two decades for active transportation investments, which seems low when compared to the identified need in local bike and pedestrian plans. Given the central role active transportation plays in meeting regional planning objectives, funding levels should be set based on full build-out of local bicycle and pedestrian plans, with an appropriate amount projected for those jurisdictions that have not yet completed such plans. The currently proposed funding level does not appear to be rooted in such a need-based assessment. It is not adequate to simply compare the proposed expenditures with past levels independent of a needs assessment. In addition to the total funding level, the proposed timing of active transportation investment is inadequate. Only 20 percent of the proposed expenditures would occur during the first 15 years of the 25-year planning period, leaving the vast majority of expenditures for the highly speculative future and of little use to current residents. Transit and transportation demand management are similarly back-loaded with only highway-related investments receiving funding priority in the near term. These nonhighway investments are the ones most likely to generate greenhouse gas emissions savings, among other benefits, and the earlier they are made the longer the benefits can accumulate. The proposed expenditure plan runs directly counter to the stated emphasis of the SCS.	investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates. SCAG cannot unilaterally change the near term commitments that are already in place. Significant increase in funding for active transportation proposed in the 2012 RTP/SCS is largely predicated on additional revenues from new sources that will require future actions at the state and/or federal levels. Therefore, the plan realistically assumes that these funds will not be available in the near term. The earliest these funds are expected to be available is 2026.
140-05	Elizabeth Cheadle	Santa Monica Mountains	Active transportation projects, including the river parkways, are suffering for lack of funding. The most visionary plans, such as	Comment noted.

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		Conservancy	the City's Los Angeles River Revitalization Master Plan, require extensive funding to come to fruition and provide their multiple benefits. Planning is well underway, but capital dollars are in short supply for these projects. Furthermore, achieving greenhouse gas reduction and air quality goals requires early mode shift to maximize cumulative benefits over the life of the plan. The Conservancy suggests that the plan's funding priorities be reversed to immediately fund active transportation investments at a sufficient level to achieve build-out of the region's bicycle and pedestrian networks in the near and medium term. Such a change would make the RTP more consistent with the land use and mode share objectives outlined by the SCS, the intent of SB 375.	
140-06	Elizabeth Cheadle	Santa Monica Mountains Conservancy	Environmental Justice and Public Health Like SCAG, the Conservancy takes its commitment to environmental justice seriously as a State agency. The Conservancy is therefore delighted to see equal access to parks, one of its core missions, considered as a performance measure for environmental justice. The SCAG model does not currently include programs intended to ameliorate these access issues, such as the Mountains Recreation and Conservation Authority's (MRCA) Transit to Trails program. Given the inherent remoteness of open space parkland, it is likely infeasible to run regular transit service to most parks. The highly successful Transit to Trails fills this gap, but is perpetually underfunded in comparison to the access demand. Funding for such programs from SCAG transportation funds would be appropriate mitigation for impacts to environmental justice populations. Part of embracing environmental justice as a core mission includes looking holistically at issues that affect the community. Poor air quality is not the only impact from a transportation system that is overly reliant on cars. Obesity and related illnesses are a direct result from community design that does not allow for safe opportunities to walk and bike for everyday transportation. The RTP/SCS should therefore include obesity-related health outcomes as a performance measure for the regional transportation system. The currently unequal health outcomes will require targeted investments in disadvantaged communities to create active transportation networks that provide access to services, jobs, schools, and parks. River parkways directly	Comment noted. SCAG is continuously working to improve its data and technical approaches to analyzing the behavior patterns of the region's 18 million residents. In order to improve local knowledge on the health impacts associated with the built environment, SCAG is currently in the process of enhancing our Sustainability Tool (ST) by refining its base data on the built environment, and through collecting information for the following areas (1) health outcomes, (2) safety - pedestrian & bike accidents and injuries, (3) emissions (PM, CO, CO2, NOx, Ozone) and air quality (dispersion), (4) energy usage (electricity & gas), (5) water usage, (6) water quality (total maximum daily loads - TMDL), (7) Vehicle Miles Traveled (VMT) and accessibility, (8) various environmental indicators (such as pollutant information available from the US Environmental Protection Agency's Toxics Release Inventory (TRI)). Once this information is obtained, staff can conduct a correlation and modeling analysis to link the built environment and determinants (road, freeway, transit, school, hospitals, etc., buildings, design, fast food and or healthy food access, park, open space, walk/bike ways) with the environmental outcomes listed above. So far, SCAG staff has obtained health data from Los Angeles County Department of Public Health, parcel level gas and electricity consumption data, and water consumption data for certain localities. We anticipate there will be many collaborations and technical exchanges with stakeholders in various policy areas with the aim of reaching consensus on recommended approaches in this effort and best practices for

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			address this need by providing bikeways through many of the poorest communities in the region.	the use of the tool. As noted in more detail below, there are performance measures that have been suggested by stakeholders for monitoring use, such as obesity-related health outcomes. However, these measures require additional efforts for data collection or further research to determine their potential uses for monitoring. They will be included in future RTP/SCS updates if additional data and research are completed. Additional funding for Transit to Trails could be discussed in greater detail in preparation for the 2016 RTP, with input from the Region's County Transportation Commissions. SCAG looks forward to working with the Santa Monica Mountains Conservancy on these important future efforts.
140-07	Elizabeth Cheadle	Santa Monica Mountains Conservancy	Additionally, the safety performance measure appears to discount the health benefits of active transportation while overstating risks. SCAG methodology rewards shifts to "safer" modes, but uses datasets that penalize pedestrians and bicyclists for being hit by cars. This methodology would discourage investments that increase active transportation when it is precisely these investments that address the safety issues faced by those bicycling and walking on public streets. The methodology further does not include the well-documented "safety in numbers" phenomenon that decreases risk for active modes the more people utilize them. Likewise, it does not consider improved public health outcomes that have been calculated to more than offset risk. The poor safety performance of walking and bicycling modes is justification for increasing investment in active transportation, particularly separated facilities for bicyclists.	Comment noted. The Active Transportation Appendix notes that research performed by Dr. Jennifer Dill (Portland State University) indicates that increases in dedicated bicycle facilities (bicycle lanes and bicycle paths) in those cities have resulted in greater bicycle usage. In addition, in NYC, while bicycling use has doubled along with the number of bicycle facilities, bicycle fatalities have not grown, and injuries have actually declined in total. While the anecdotal evidence indicates an increase in bicycling also provides an increase in safety, specific research on the causes for that safety increase has only recently started. Active Transportation Safety policies include incorporating complete streets policies at the local level to provide safe access for all modes – as fundamental principles of transportation plans. SCAG is proposing to increase the number of bikeways in the region from approximately 4,300 miles to over 10,000 miles. SCAG is also proposing to increase the funding for active transportation from $1.8 billion to $6.7 billion. Figure 9 of the Performance Measures Appendix includes the number of bicyclist and pedestrian fatalities per 100 million vehicle miles. The Performance Measures Appendix notes that an RTP Goal is to "Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)." There are performance measures that have been suggested by stakeholders for monitoring use. However, these measures require additional efforts for data collection or further research to determine their potential uses for monitoring. They will be included in future RTP/SCS updates if additional data and

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				research are completed.
140-08	Elizabeth Cheadle	Santa Monica Mountains Conservancy	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 74.
141-01	Wally Siembab	Siembab Corporation	Despite its relative low capital cost and high cost-effectiveness, telecommuting remains in 2012 a marginal strategy for reducing GHG emissions and congestion. The 2012 RTP could lay out the path by which telecommuting could reach its potential, particularly in an RTP with such a gigantic revenue shortfall. But it doesn't. Table 4.5 of the SCS lists only one specific telecommuting action/strategy, and it will do nothing to change the marginal role of telecommuting over the next 4 years. "Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options." The discussion of Telecommuting/Work-at-Home in the TDM Appendix is equally unhelpful, focusing on barriers to telecommuting and mentioning a few policies to overcome those barriers, none innovative nor likely to make a difference. One of the basic problems with telecommuting in the 2012 RTP (and previous RTPs) is that the strategy is treated as a member of the TDM family of policies. However, among all the TDM options, only telecommuting mimics land use. Telecommuting, like other network applications associated with "distributed organizations" (such as tele-medicine, e-retail, distance education, etc), can affect the location of destinations. For example, portions of auto-oriented employment centers can be strategically re-located into walking neighborhoods. In other words, telecommuting can impact the spatial distribution of functionality. It is really a way of implementing "location efficiency." Beyond that conceptual revision, there are a number of strategic options that should be added to the 2012 RTP. Goal should be for every employee except for those involving physical materials-handling or other hands-on activity (like truck driving) to expect some to be offered some telecommuting option; with every employer expected to authorize an alternative work site within 4 miles of every eligible employee's home. This is consistent with existing travel patterns to other	Comment noted. According to the American Community Survey, the percentage of workers telecommuting has been growing significantly over the past 10 years. SCAG as a regional planning agency is restricted to policy recommendations to local jurisdictions to remove barriers and increase incentives for telecommuniting.

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			destinations; is compatible with short-range electric vehicles; and will reinforce the "neighborhood oriented development" (NOD) strategy.	
141-02	Wally Siembab	Siembab Corporation	Four initiatives are required to reach that goal. 1. Regional Telework Facilitator Public agencies trying to encourage the telework strategy tend to do so through corporate demonstration programs. The AQMD recently funded such a program which is in process today. Demonstration programs have been repeatedly found to produce short term but not long term results. When the funding goes away, the active teleworkers begin to decline back to pre-demonstration levels. Establishing the institutional infrastructure that will support telework in the long run is the most effective step that could be taken. Similar to the old "Commuter-Computer" for ride sharing, this regional organization would market the telework option (in all of its varieties – home based, satellite, shared work center, network access center, etc.) to employers. Other tasks include maintaining best practices, offering first line technical assistance, and making referrals to implementation consultants. A five year public commitment would be best, giving the organization the opportunity to develop a business plan in order to continue operating with a minimal public subsidy. Technology firms with products used in telework are good candidates to serve as private partners.	Comment noted.
141-03	Wally Siembab	Siembab Corporation	2. Opinion Leaders Elected officials, public sector executives plus leading private CEOs committing their own organizations to an aggressive telework program is also essential. The organizations and their commitments should have a high profile. The practice should also include the full range of distributed applications such as distance education, telemedicine, e-retail, etc. The Regional Telework Facilitator should organize and maintain this public-private leadership council.	Comment noted.
141-04	Wally Siembab	Siembab Corporation	3. Telework Facilities Exchange The Telework Facilities Exchange (TFX) was a work-station sharing program for government employees that I designed and implement in the mid-1990s, sponsored by the League of California Cities and funded by the SCAQMD. Government	Comment noted. Innovative solutions similar to the Telework Facilities Exchange are occurring. SCAG uses a similar program at its satellite offices. In addition, short and medium Term office rental (including receptionists, meeting rooms and copy machines) are being advertised for the private sector home

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			employees (city, county, state, federal) were matched to a vacant work station in another government building near their residence. It was, at the time, the largest multi-jurisdictional telework program in the nation. The planning and advocacy function of the project was the prototype Regional Telework Facilitator.	based businesses that need occasional office services. With the costs of bandwidth decreasing, teleworking from home is becoming more cost effective and accepted by supervisors. Occasional telecommuters are going to meetings and working using free wi-fi capabilities.
141-05	Wally Siembab	Siembab Corporation	4. Network Access Centers Network Access Centers (NAC) are a new type of public facility that will contribute to transportation access, economic development, and education. A NAC is a multi-function, multi-user facility that provides technical assistance, fast network connections, information technology, work stations, meeting space, and special programs that include distance education classes, tele-medicine consultations and so forth. A NAC is essentially a programmable building whose functionality can be changed hour by hour, day by day to satisfy community need for travel. NACs should be added to transit stops (especially multi-mobility hubs), public schools, public libraries, neighborhood centers, and downtown districts. The Blue Line TeleVillage in Compton, funded by Metro in the late 1990s, established proof of concept in LA County. Yet it was not replicated.	Comment noted. Office space (including associated services) are being advertised for short and medium term lease for home based workers and out-of-area work teams to have a base of operations and to meet clients in a more formal setting. SCAG can consider the feasibility of Network Access Centers in future research on first/mile solutions.
142-01	Mike Bullock	Sierra Club	I have saved the file provided by Mark. I contains some very valuable ideas. Great work! As a retired systems engineer, I view our top-level requirement to be climate stabilization. The file "SDSC_to SANDAG_Re_CARB" shows that we need a 35.1% reduction in per-capita driving, by 2035, with respect to 2005. It is also shown that this is a 15% drop in net driving. So why add lanes? But how can we get such a decrease? Many of your strategies are important. However, the most important would be to unbundle the cost of driving and parking. Regarding parking, I have attached my peer-reviewed and published report, "Manuscript19c". For roads, I have attached "2011NevadaRoadUseDraft".	Comment noted. In the Transportation Demand Management Appendix, SCAG encourages all jurisdictions to consider various parking and parking pricing strategies.
142-02	Mike Bullock	Sierra Club	From the parking report's Section "A GLIMPSE INTO A POSSIBLE FUTURE ": Jason is driving to work for the first time in several years. He has decided to save money by carrying home a new 3-D, big-screen computer, which he plans to purchase at a store near his office after work. He wanted to avoid paying delivery	Comment noted. The 2012 RTP/SCS includes an investment to improve and expand real-time passenger information systems for transit services.

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			charges. Things have been changing around his office development since they unbundled the cost of parking at the near-by train station. Many people who caught the early trains and lived close to the station stopped driving and parking in the best parking spaces; demand for housing close to the station went up; and wealthy riders, who insisted on driving, did so, confidant that they could always find parking as close to the platform as their schedules required, due to congestion pricing. Who would have guessed how much those people were willing to pay? It was shocking. Parking-lot earnings, paid to round-trip train riders, meant that the net cost to ride the train went significantly down. Ridership and neighborhood vitality both went significantly up. All Jason knew was that the price to park at his office had been going up yearly because of increased land values. His parking-lot earnings from his office had been increasing almost every month, due to the ripple effect of train riders parking off-site at cheaper parking. Some of them were using his office parking. As he pulls out of his driveway, he tells his GPS navigation unit his work hours (it already knew his office location), the location of the store where he plans to buy the computer, and his estimated arrival and departure times at the store. He tells the GPS unit he wants to park once, park no more than 1 block from the store, walk no more than 1 mile total, and pay no more than an average of $2 per hour to park. He is not surprised to hear the GPS tell him that his request is impossible. He tells the GPS he will pay an average of $3 per hour and learns that the GPS has located parking. It guides him into a church parking lot. He hopes the church will use his money wisely. The GPS tells him the location of a bus stop he could use to get to work and the bus‟s next arrival time at the stop. With automatic passenger identification and billing, the bus has become easy to use, except that it is often crowded. Jason gets out of the car and walks to work, with no action required regarding the parking.	
142-03	Mike Bullock	Sierra Club	Three weeks later, when Jason gets his monthly statement for his charges and income for automotive road use, transit use, parking charges, and parking earnings, he finds that the day‟s parking did indeed cost about $30 for the 10 total hours that he parked. He notes that the parking-lot earnings for his office parking averaged about $10 per day that month. He then	Comment noted.

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			notices the parking lot earnings from the store, where he spent about $1000 dollars. He sees that the parking-lot earnings percent for the store that month was 1.7%, giving him about $17. So for the day, Jason only spent a net of about $3 on parking. Then he realized that he should have had the computer delivered after all. If he would have bicycled that day, as he usually did, he would have still gotten the $27 earnings from the two parking facilities and he would have paid nothing for parking. So the choice to drive cost him $30. He remembers that the delivery would have only been $25 dollars. Oh well. He enjoyed his before-work and after-work walks.	
143-01	Ellen Perkins	South Bay Cities Council of Governments	The SBCCOG lacks the resources to comprehensively review and comment on the RTP and PEIR. We have reviewed the comments being submitted by the Orange County and Gateway Cities Councils of Governments and are in general support them.	Comment noted.
143-02	Ellen Perkins	South Bay Cities Council of Governments	In particular, we want to reinforce the following: • Gateway COG's question regarding the Financial Plan - Table 3.4.1 which presents Core and Reasonably Available local sources of revenue and includes development mitigation fees for Orange and Riverside Counties. Does the revenue estimate include any assumption of funds from the potential adoption of a development fee in Los Angeles County?	Comment noted. The RTP Financial Plan does not assume any revenues associated with the congestion mitigation fee feasibility study currently being explored by Metro as a part of a proposed restructuring of its Congestion Management Program.
143-03	Ellen Perkins	South Bay Cities Council of Governments	• OCCOG's request that SCAG adopt growth forecast numbers at the county level rather than lower geographical levels such as city or census tract.	Comment noted. Based on statutory requirements of SB 375 (Government Code Section 65584.04(i), subparagraphs (1) and (3)) the Regional Housing Needs Assessment must be consistent with the RTP/SCS land use development pattern. The RHNA allocation being adopted at the jurisdictional level necessitates that the SCS be based on a jurisdictional level growth distribution.
143-04	Ellen Perkins	South Bay Cities Council of Governments	Our focus was on the SCS portion of the RTP. Our comments address strategies included in Tables 4.3 and 4.4 and we request the following changes: Add the following new options: Update local zoning codes, General Plans and other regulatory policies and pursue opportunities to develop appropriately scaled mixed office-retail commercial centers within walking distance of residential neighborhoods Responsible parties: Local jurisdictions	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-05	Ellen Perkins	South Bay Cities Council	Land Use Actions and Strategies, Table 4.3 Update local zoning codes, General Plan and other regulatory policies to accelerate	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.

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		of Governments	adoption of land use strategies that will over time convert auto oriented intersections of major arterials into mixed office-retail commercial centers. Responsible parties: Local jurisdictions	
143-06	Ellen Perkins	South Bay Cities Council of Governments	Land Use Actions and Strategies, Table 4.3 Expand Compass Blueprint priorities to support member cities and sub-regional COGs adopting neighborhood oriented development as a land use strategy and range-limited electric vehicles as a mobility strategy. Responsible parties: Local jurisdictions, COGs, SCAG	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-07	Ellen Perkins	South Bay Cities Council of Governments	Land Use Actions and Strategies, Table 4.3 Amend the following existing options (as indicated in italics[quotes]): Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the RTP/SCS Alternative, "or that have been formally adopted by any sub-regional COG that is consistent with regional goals." Responsible parties: Local jurisdictions	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-08	Ellen Perkins	South Bay Cities Council of Governments	Land Use Actions and Strategies, Table 4.3 Amend the following existing options (as indicated in italics[quotes]): Pursue joint development opportunities to encourage the development of housing and mixed-use projects around existing and planned rail stations, along high-frequency bus corridors, in transit oriented development "and in neighborhood oriented development." Responsible parties: Local jurisdictions, CTCs	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-09	Ellen Perkins	South Bay Cities Council of Governments	Land Use Actions and Strategies, Table 4.3 Amend the following existing options (as indicated in italics[quotes]): Support projects, programs, policies and regulations to protect resource areas, such as natural habitats and farmland from future development; and "support project, programs, policies, and regulations that lead to development of “complete communities” on greenfields." (A diversity of housing choices and educational opportunities; jobs for a variety of skills and education; recreation and culture; a full-range of shopping, entertainment and services; all within a relatively short distance) Responsible parties: Local jurisdictions, SCAG	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-10	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Add the following new options: Promote the use of range-limited battery electric vehicles through land use policies that bring origins and destinations closer together such as the neighborhood oriented development strategy; and through transportation infrastructure such as complete streets (designed to accommodate slow speed electric vehicles) and	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.

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			EVSE deployment in homes and in public parking lots. Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs	
143-11	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Add the following new options: Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive (DRT) in order to both serve and encourage development of compact neighborhood centers. Responsible parties: CTCs and municipal transit operators	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-12	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Add the following new options: Ensure every sub-region has multiple access points to the regional high speed transit network with at least one of them being a candidate for development into a multi-mobility hub (MMH). Responsible parties: CTCs and local jurisdictions	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-13	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Add the following new options: Lobby the state to provide funding for complete streets planning and implementation in support of reaching SB 375 goals. Responsible parties: SCAG, State	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-14	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]): Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities, accessibility to transit via non-auto modes "and ZEV modes, and accessibility via ZEV modes." Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-15	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations "and neighborhood commercial centers." Responsible parties: Local jurisdictions, SCAG	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-16	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, HQTAs, "and neighborhood commercial centers" providing an incentive for residents and employees to make trips on transit	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.

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			"and/or stay in the local communities." Responsible parties: Local jurisdictions, SCAG, and CTCs	
143-17	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Develop first mile/last mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking "or driving neighborhood electric vehicles or other ZEV options." Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs	Comment noted. Table 4.4 has been updated to reflect this recommendation.
143-18	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Encourage the development of a Complete Streets policy, "explicitly accommodating slow speed and other ZEVs." Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs	Comment noted. The 2012-2035 RTP/SCS has been updated to address comment, as appropriate.
143-19	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Develop infrastructure plans and educational programs to promote active transportation "and ZEV " options. Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs	Comment noted. Table 4.4 of the final RTP/SCS has been updated to include a specific action/strategy for ZEV options.
143-20	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Emphasize active transportation projects "and slow speed ZEV modes" as part of complying with the Complete Streets Act Responsible parties: Local jurisdictions, COGs, SCAG, and CTCs	Comment noted. Table 4.4 has been updated to address comment, as appropriate.
143-21	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Collaborate with local jurisdictions "and sub-regional COGs" to develop regional policies regarding TSM Responsible parties: Local jurisdictions, COGs, SCAG,	Comment noted. Revised Table 4.6 to "Collaborate with the State and Federal Government and sub-regional COGs to examine potential innovative TDM/TSM strategies.
143-22	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Collaborate with local jurisdictions "and sub-regional COGs" to update the ITS inventory. Responsible parties: Local jurisdictions, COGs, SCAG	Comment noted. Table 4.6 has been updated to reflect this recommendation.
143-23	Ellen Perkins	South Bay Cities Council of Governments	Transportation Network Actions and Strategies, Table 4.4 Amend the following existing options (as indicated in italics [quotes]) Collaborate with the State and Federal Government "and sub-regional COGs" to examine potential innovative TDM	Comment noted. Revised Table 4.6 to "Collaborate with the State and Federal Government and sub-regional COGs to examine potential innovative TDM/TSM strategies.

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			strategies Responsible parties: SCAG, State and COGs	
143-24	Ellen Perkins	South Bay Cities Council of Governments	In addition, the 2012 RTP should include a preliminary cost estimate for implementing the Regional PEV Readiness Plan and the sub-regional strategies to develop infrastructure and supportive land uses mentioned in Table 4.7. The completed PEV Readiness Plan will provide such an estimate however that will occur after RTP adoption so that an estimate as place holder should be added in this plan.	Comment noted. SCAG received two grants for PEV Readiness Infrastructure Planning, with generous support from the SBCCOG. The total of the grant funds was $500,000. This is a new area of study for SCAG and the cost for implementation is unknown at this time. As the Regional PEV Readiness Plan progresses over the next 24 months, SCAG and its subregions will have a better estimate of the cost of such a plan.
143-25	Ellen Perkins	South Bay Cities Council of Governments	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 75.
144-01	Elaine Chang	South Coast Air Quality Management District	AQMD staff appreciates that the lead agency has worked with our staff and the CARB staff to develop an aggressive plan containing transportation policies that promote zero emission technologies. AQMD staff looks forward to our joint efforts with SCAG staff on future demonstration and deployment of these important technologies, including a zero emission on-road demonstration project within the next one to three years. Further information in the Final EIR and RTP about the following strategies would be helpful to provide clarity in how these aspects of the plan impact air quality. 1) Although zero emission technologies are described in the Draft RTP, it is not clear to what extent the emission reductions from these projects have been included in the constrained plna (e.g., RTP Table 2.11). The Final RTP/SCS and PEIR should include specific details about how much of the emission reduction benefits of the I-710 corridor project, East-West freight corridor project, and zero emission deployment from the ports to near dock rail yards are included in the 2035 emission calculations. 2) SCAG should work with local transportation agencies, the ports, and other private and public stakeholders to identify funding in the constrained plan for zero-emission technology demonstrations (or initial deployments) in the port to near dock rail yard corridor. These should involve multiple technologies, including technologies with potential for regional application, and should involve major truck manufacturers. Such demonstrations can and should be initiated by no later than 2013 and should include testing and evaluation of wayside power (e.g., catenary trucks), battery electric trucks, and fuel cell trucks. AQMD will partner in	Comment noted. Although zero-emission technologies are described in the Draft RTP, SCAG did not include emissions reductions from these projects in the constrained plan. SCAG will provide further clarification on funding and near-term demonstration initiatives for zero-emission technologies. SCAG looks forward to our joint efforts with AQMD on future demonstration and deployment of these critical technologies.

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			supporting this measure (e.g., funding, seeking funding partners, and developing other support). 3) The Draft RTP/SCS includes several key port-related projects such as the SCIG and ICTF that are considered critical to the regional goods movement system and will have serious air quality implications for the basin and substantial impact on the heavy duty truck distribution in the region. Specifically, the Draft RTP/SCS indicates these projects are needed to address an overall growth volume at the San Pedro Bay Ports of up to 43 million containers by 2035 - more than tripling current levels. In addition, this significant growth in heavy duty truck traffic calls for the need to develop zero and near-zero emission goods movement technologies.	
144-02	Elaine Chang	South Coast Air Quality Management District	One of the primary goals of the SCS is to decrease per-capita greenhouse gas emissions from passenger vehicles and light duty trucks. These greenhouse gas reductions will have the co-benefit of reducing emissions of criteria pollutants. Because the SCS is an integral part of the RTP and therefore the AQMP, timely implementation of the SCS goals is relied upon to meet air quality standards. As a result, the AQMD staff requests that the plan be revised to include a periodic tracking and reporting element for the SCS that would occur more frequently than the regular RTP cycle. Specifically, staff requests that the tracking process not be limited to policy review of the SCS, but also include identification of revenue sources (see funding comments) and other metrics deemed appropriate by SCAG. These reported metrics should be made available to the public to ensure that our basin remains on track to meet AQMP goals.	Comment noted. As done in the past, the RTP is typically amended once or twice within a regular four-year RTP cycle. In addition, the FTIP is developed every other year. For each RTP amendment and FTIP, a complete update of transportation conformity analysis including regional emissions test and financial constraint test are performed to demonstrate that the RTP and FTIP are consistent with the goals and objectives of SIPs/AQMPs. In anticipation of additional needs to support and track the implementation of the 2012-2035 RTP/SCS, SCAG staff plans to further enhance its regional monitoring program as part of the post-RTP adoption activities. Staff will continue seeking input from member jurisdictions and other partners and stakeholders in developing an enhanced monitoring program.
144-03	Elaine Chang	South Coast Air Quality Management District	As required by federal regulation, SCAG has included a financial plan to demonstrate how the RTP can be implemented. The plan includes financial resources that are "reasonably expected to be available" to carry out the plan. However, about $219.5 billion out of a total of $524.7 billion in costs of the RTP are expected to be funded by "new" sources of funds that are not currently available ("core" funds). This means that over 40% of the total cost of the plan is dependent on future new funding. Federal regulation provides that in the case of new funding sources, "strategies for ensuring their availability shall be included." A review of the "new" funding sources indicates that most would require further action by the state legislature,	Comment noted. However, SCAG's analysis and documentation of reasonably available sources demonstrates consistency with federal and state requirements. Under 23 CFR 450.322, an RTP meets the financial constraint requirement by including "sufficient financial information for demonstrating that projects" in the plan "can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained." The determination of the RTP's compliance with fiscal constraint, as part of meeting air quality conformity requirements, are made at the time of plan adoption or

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			Congress, and/or a vote of the people. Moreover, federal regulations require the financial plan to "address the specific financial strategies required to ensure the implementation of TCMs in the applicable SIP." We are concerned that these strategies are not sufficiently identified and assured of implementation. State law also requires the RTP to include a financial element, which must summarize "the cost of plan implementation constrained by a realistic projection of available revenues." The financial element may recommend the development of specified new sources of revenue. However, in describing the requirement for "financial constraint," the treatise California Transportation Law (Solano Press, 2000; March, Jeremy) provides at page 139 that the plan should: "Explain the consequences of living with existing revenues only, including what parts of the plan would not be achievable (without new revenues). Indicate alternative policy directions if proposed revenues are not realized, and the time frame when the change in policy direction should be undertaken if proposed revenues are not forthcoming." The RTP does not currently present sufficient information to demonstrate why the "new" funding sources must actually become available. Moreover, it does not identify which measures or projects are to be funded by "core" revenues (those already available or committed) and which are to be funded by "new" sources. In order for the public and policymakers to have a clear understanding of why the "new" funding sources must become available, and thus to implement the needed steps for this to occur, the RTP should clearly identify the consequences if the plan were forced to depend only on "core" funding.	amendment. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. The majority of funds identified as reasonable available revenues (excluding core revenues), are not assumed to be available until the latter years of the RTP. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
144-04	Elaine Chang	South Coast Air Quality Management District	AQMD staff initially requested that SCAG prepare an analysis in the Final RTP/SCS of what transportation control measures would be needed to offset growth in emissions due to growth in VMT, if the decision in AIR v. EPA were to become final [632 F.3d 584 (9th Cir. 2011)]. The conformity section of the Draft RTP acknowledged in a footnote that the RTP would not be sufficient, but did not explain what would be required. On January 27, 2012, the Ninth Circuit Court of Appeals denied EPA's petition for rehearing in that case. As a result, AQMD staff is now requesting a scenario analysis that includes the incremental emission impact in the SCAB due to VMT growth.	Comment noted. SCAG will continue working with EPA, ARB and SCAQMD to understand the full implications of the recent Ninth Circuit Court Ruling in the Association of Irritated Residents et al. v. EPA case (Nos. 09-71383 and 09-71404) related to the Transportation Control Measures (TCM's) for the non-attainment area contained within this plan. SCAG will amend the plan (if required) once the EPA has finalized their analysis and published applicable guidance.

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			This scenario analysis would use the difference between 2035 VMT and the VMT from years 1997, 2008, and 2012, and applicable vehicle emission rates in 2035. The Draft EIR compares today's emissions with future emissions, and compares emissions with the project compared to emissions without the project. We request that SCAG analyze the emissions impact of growth in VMT. For illustration purposes, staff reiterates its request that the RTP also include an analysis of what additional Transportation Control Measures it would take to comply with this decision.	
144-05	Elaine Chang	South Coast Air Quality Management District	In order to provide certainty and transparency to the public, the details regarding the planning assumptions in the RTP/SCS (such as housing density, distribution of employment, etc.) should be made publicly available upon approval of the Final RTP/SCS. Because the RTP/SCS will be used to determine whether future projects can utilize new CEQA streamlining procedures, stakeholders need to have a readily available data source that describes what planning assumptions are included in the SCS. This final SCS planning scenario at the local level should be published and available to the public, and any future changes/amendments should also be made available for review so that all stakeholders can evaluate the consistency of future projects with the SCS.	Comment noted. The TAZ-level dataset and any details regarding the planning assumptions in the RTP/SCS are available upon request.
144-06	Elaine Chang	South Coast Air Quality Management District	The AQMD staff appreciates SCAG's participation at the February 1, 2012 study session on the economic impact of the Draft RTP/SCS. At that meeting SCAG acknowledged and clarified the limitations of the Draft RTP/SCS economic analysis released in December of 2011 and presented the results from additional analyses. Based on our understanding of the economic analysis from that meeting, we request that SCAG provide further clarification on its methods in assessing RTP employment impacts. This information is crucial because the AQMP heavily relies upon employment figures generated by the RTP for emission projections. For example, the Draft RTP assumes that employment will be the same with and without the plan (Table 3.10-10 of the Draft EIR). Any additional analysis conducted after the draft document on job impacts should be released prior to approving the Final RTP and should provide more detailed description on the analysis assumptions and proper interpretation of the results. Also, the AQMD staff	Comment noted. The analysis conducted by SCAG and consultant team identified 174,500 as associated with spending approximately $21 billion per year as outlined in the 2012 RTP/SCS for capital projects and operating and maintenance expenditures. The 174,500 is an annual average associated with the RTP spending but it is not a cumulative number. In addition SCAG estimated that implementation of 2012 RTP/SCS projects and strategies could support as many as additional 354,000 jobs (on average for 2010-2035) as result of productivity benefits from travel time and cost savings and the associated impact on regional economic competitiveness. All of these job levels are incorporated in the 2.2 million job growth forecast developed in the regional growth forecast process. The growth forecast assumes that enabling policies, such as education, labor force training, AQMP, RTP, etc., are in place or will be adopted to support the economic competitiveness assumptions that underlie the jobs forecast. SCAG did not analyze the impact of

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			recommends inclusion of the financing component of operation and maintenance expenditures in the job impact assessment of the RTP/SCS.	the no project alternative on regional job growth. One point to note is that the no project alternative probably does not mean that nothing in the RTP is implemented. Much of the funding is already in place and not subject to change. Two sets of impacts are likely to occur. The first is that if the money is not spent on all the RTP projects, it will be spent in other ways by businesses, residents and public agencies so the RTP job impacts would be replaced by job impacts from other ways of spending the money. The second set of impacts is that it is likely that some of the productivity benefits from the RTP (jobs gained through time and cost savings and competitiveness) would disappear in the no project alternative. As a result a refined analysis is likely to show that the no project alternative would result in a lower level of regional job, population and household growth as compared to the proposed RTP. SCAG will keep AQMD updated as additional economic analyses of the RTP are completed. SCAG staff welcomes further face-to-face meetings with AQMD staff to ensure that we are all in agreement about the economic and job impacts from 2012 RTP/SCS and their incorporation into the forthcoming 2012 AQMP.
144-07	Elaine Chang	South Coast Air Quality Management District	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 76.
145-01	Lisa Payne	Southern California Association of Non-Profit Housing	The RTP is leaving out one very important component for a sustainable region. What's driving the congestion on the highways is people being unable to afford to live close to where they work. Homes within reach of workers in transit were raised at many of the community hearings that SCAG had in the different counties. There is nothing in the RTP that address this mismatch between what people make and what housing costs. I urge SCAG to do a rigorous study of a jobs-housing fit throughout the region. National studies have shown that what most often happens around rail transit stops is that the cost of housing around the stops goes up, car ownership around the stop goes up, and transit ridership rises more slowly than expected or even declines more rapidly than in the surrounding metro area. In one study there was a recommendation that what transit systems need in order to have ridership is not transit oriented development but neighbors that will use the	Comment noted. After Plan adoption, we will continue to work with our stakeholders to identify appropriate metrics for analyzing and monitoring key assumptions and outcomes.

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			transit system, the SCANPH thinks we need both. The RTP really focuses only on the form of the transit oriented development and not on who is living inside them and whether they are really going to be using the transit system. The SCANPH feels strongly that the success of a push for sustainable growth depends on having a jobs-housing fit. City of Los Angeles as an example, obviously where most of the transit rail stops are going to be, nearly one-half of our workers in LA make under twenty-five thousand a year at their jobs. Fifty percent make under fifty thousand per year. The average income of households currently living around the rail transit stops is about thirty thousand per year. What is being planned in terms of transit oriented development around transit in LA however, are apartments for single people and couples that make over eighty thousand a year. If we don't watch out the cost homes around transit will be expensive and most of the workers will be driven out to the suburbs, to the periphery, and will be shut out from living around the transit stops. We need an on-going and rigorous study to see what we are getting around the transit stops. We know that providing affordable homes for workers and transit riders requires resources. Often a first step for getting resources is to lay out where we are in terms of meeting the need for affordable homes to match the jobs we have. SCANPH and other housing organizations throughout the State are already advocating for more resources and land use policies to g	
146-01	Multiple Signers	Southern California Business Community	Turning to the substance of the RTP/SCS as a policy matter, we have the following additional general comments: 4) The RTP/SCS is undergirded by analysis which shows the dispersion of populations and employment shown and categorized at the level of sub-jurisdictional "transportation analysis zones" (TAZs). The TAZ level of detail is, we believe, too small and precise a level at which to prescribe the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. Page 148 of the SCS should therefore be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or sub-regional level, not at a TAZ level.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The growth and land use assumptions as part of the final RTP/SCS are proposed to be adopted at the jurisdiction level.
146-02	Multiple Signers	Southern California	5) The RTP/SCS should aim to reflect and accommodate both the short-term future of the SCAG region and its long term	Comment noted. The RTP/SCS is a long- range planning document that accounts for vehicle fleet turnover and presents

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		Business Community	future. For example, the RTP should better anticipate the need for and reasonable likelihood of a gradual transition in the region's overall vehicle fleet (e.g., gradually towards alternative fuels) and the ongoing need for enhancements to vehicular mobility even as more mass transit comes to fruition.	both near-term and long-term strategies to address the on-going need for enhanced mobility in all transportation modes.
146-03	Multiple Signers	Southern California Business Community	6) More detail, clarity and explanation are needed concerning the new revenue sources that are outlined within the plan document. New revenues account for $219.5 billion out of the total $524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS). To fully and fairly evaluate these proposals, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following: a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement. b. The new revenue sources within the RTP must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
146-04	Multiple Signers	Southern California Business Community	7) New revenues from fees on businesses operating in the SCAG region - and particularly the "Freight Fee/National Freight Program" listed on page 96 of the Draft RTP - need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region's competitiveness will be compromised.	Comment noted. The RTP does not assume the implementation of local, regional, or statewide freight fees. Ensuring that the SCAG region or its member entities are not at an economic disadvantage were critical considerations used in the development of all funding proposals included in the RTP.
146-05	Multiple Signers	Southern California Business Community	8) In the RTP, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness,	Comment noted. SCAG recognizes the significant contribution of the goods movement sector to the regional and state economy. SCAG concurs that any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, and reliability of the goods movement system. SCAG will continue to work with all goods movement stakeholders in further evaluating technology options.

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			or reliability of the goods movement system. It would be helpful for SCAG to state clearly in the RTP that, to date, stakeholders have not reached consensus on technologies, timing, funding, or emissions impacts of the various options that SCAG examined in the RTP. For example, SCAG discusses long-term steps towards a "Zero Emissions Container Movement System" (ZECMS). If SCAG chooses to pursue such a fundamental shift in new technology, it would need to work with all goods movement stakeholders to clearly establish whether and, if so, when and where within the transportation infrastructure a ZECMS option could be demonstrated and evaluated without negatively effecting the velocity and throughput of the system.	
146-06	Multiple Signers	Southern California Business Community	9) With the recent elimination of redevelopment agencies, the ability of local jurisdictions to meet the densification of urban centers in the near term is challenged, given the costs related to aging or inadequate infrastructure capacity and high development costs for higher density projects. The elimination of redevelopment agencies also threatens the availability of sufficient housing options necessary to meet the needs of a dynamic workforce. In fact, since the passage of SB 375, the State of California has stripped local governments of funds that were previously available for transit, transportation and redevelopment. This follows many years in which the state diverted revenues from gasoline, sales, income and other taxes needed for local government programs. Local governments cannot help to fulfill the 2012 RTP/SCS without increased, not decreased, state support. SCAG should emphasize the need for the state to restore support for planning, transit, transportation and redevelopment or other necessary funding to pre-SB 375 levels in order to speed the attainment of mandated goals. While we find many very positive aspects in the plan, especially related to principles and direction, these significant issues need to be addressed. The short list of general concerns set forth above is not meant to be exhaustive. Many of the organizations that subscribe to the above-stated comments will be commenting more robustly in separate writings. We join here, however, to express our unity in finding the Draft 2012 RTP/SCS and PEIR to be in need of significant clarification and correction. We are also jointly committed to completing this process and, over the remaining weeks, working closely with SCAG to	Comment noted. The elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects intended to support the policies in the 2012 RTP/SCS. SCAG will continue to identify funding resources for local governments pursuing such policies.

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			develop and adopt a smart, flexible, accountable, and economically sound RTP/SCS.	
146-07	Multiple Signers	Southern California Business Community	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 77.
147-01	Larry Russell	Southern California Contractors Association	According to the Construction Industry Research Board, Burbank, total construction in California has dropped 57% between 2005-2009. Construction employment has a direct correlation with total construction activity. According to the California Employment Department, construction employment over that same period dropped from 933,700 people in 2006 to 559,800 IN 2010. That represent a 40% drop in construction employment over a five-year period. The construction industry has been hit very hard by this recession. The RTP calls for 525 billion dollar investment which will significantly boost construction activity in Southern California. The SCCA supports this plan however we echo the concerns voices earlier, we would like to see more clarity on the 219.5 billion dollars in new revenue sources outlined in the RTP. According to the American Road and Transportation Builders Association in Washington, DC, Greenfield Infrastructure Projects can now take up to nineteen years to complete from concept to construction due to NEPA and CEQA processes. SCCA is also concerned about the number of mitigation measures contained in the PEIR. We encourage SCAG to further examine the economic impacts of these mandates on our local governments and contractors and the potential for project delays and for future litigation. SCCA supports a balanced approach in providing multi-modal transportation alternative in Southern California. We encourage SCAG to ensure a truly balanced approach that balances transit, highway, freight rail, and bridge and roadway improvements with smart land use strategies and encourage walking, biking, and other transportation options.	Comment noted. The Transportation Finance Appendix provides detailed explanation on all revenue sources and summarizes the transportation expenditures included in the RTP.
148-01	Larry Russell	Southern California Contractors Association, Inc.	SCCA appreciates SCAG's goals of optimizing system performance (including preservation and maintenance), investing in completing transportation system gaps and strategic investments to expand the system as the population grows. Protecting our existing transportation infrastructure and making strategic investments to expand infrastructure will be	Comment noted.

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			key to safely moving people and goods for decades to come. SCCA supports a balanced approach to providing multi-modal transportation alternatives to southern California. We encourage SCAG to ensure a truly balanced approach that balances transit, highway, freight rail, bridge and roadway improvements with smart land use strategies that encourage walking, biking and other transportation options.	
148-02	Larry Russell	Southern California Contractors Association, Inc.	The RTP calls for $524.7B in infrastructure investment which will significantly boost construction activity in southern California. The SCCA supports this plan. However, we echo the concerns voiced at the February 2 Public Input Hearing by the Southern California Leadership Council and we would like to see more clarity on the $219.5B in new revenue sources outlined in the plan.	Comment noted.TheTransportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP.
148-03	Larry Russell	Southern California Contractors Association, Inc.	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 78.
149-01	Alexander Pugh	Southern California Edison	Growth in the use of electric vehicles: Assumptions about the number of battery and hybrid plug-in electric vehicles (PEV) in Southern California between now and 2035 may be higher than accounted for within the RTP/SCS and PEIR.	Comment noted. The RTP/SCS was developed with the best and most recent data available. With SCE as a key partner, SCAG is engaged in a multi-year planning Regional PEV infrastructure Study as well as developing detailed market forecasts. The RTP/SCS is an evolving document and will be updated in four years. At that time, SCAG will include an updated fleet mix, including new PEV assumptions. We look forward to continuing to work with SCE on the Regional PEV Infrastructure Plan.
149-02	Alexander Pugh	Southern California Edison	Currently SCE is planning for three scenarios for PEV growth within its service territory by 2020: low-175,000; medium-450,000; and high-1,000,000. In January the California Air Resources Board passed the Advanced Clean Car Initiative calling for more than one million PEVs in California by 2025. Additionally planners and researchers in Southern California, including SCAG and the UCLA Luskin Center are conducting research to guide the build out of publicly accessible charging stations region-wide. This too may further support the growth of the PEV market.	Comment noted. SCAG looks forward to continuing to work with SCE on the Regional PEV Infrastructure Plan.
149-03	Alexander Pugh	Southern California Edison	In regards to charging infrastructure, great strides have been made in southern California to update the older 1990s paddle chargers to the new J1772 standard.	Comment noted.

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149-04	Alexander Pugh	Southern California Edison	Moreover, there are a number of charging station installers and equipment manufacturers in southern California, which means both a direct positive environmental and economic impact comes from electric vehicle growth.	Comment noted.
149-05	Alexander Pugh	Southern California Edison	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 79.
150-01	Robert Cruz	Southern California Gas Company	Southern California Gas Company (SoCalGas) respectfully submits these comments regarding the Southern California Association of Governments' (SCAG) 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SoCalGas, a regulated utility of Sempra Energy has been delivering clean, safe and reliable natural gas to its customers for more than 140 years. It is the nation's largest natural gas distribution utility, providing service to 20.9 million consumers connected through nearly 5.8 million gas meters in more than 500 communities. SoCalGas's service territory encompasses approximately 20,000 square miles throughout Central and Southern California, from Visalia to the Mexican border. These comments address those portions of the RTP/SCS related to use of natural gas fuel in SCAG's region. Our overarching concern and comment is that the RTP/SCS is not balanced in terms of options presented for alternative vehicle fuels. There is an obvious and inexplicable predisposition towards electric and zero-emission vehicles (ZEVs) without apparent backup documentation regarding the cost-effectiveness and feasibility of such an "all" electric strategy. We respectfully request that SCAG produce a more balanced and pragmatic RTP/SCS that truly considers both the short-term and long-term future of the region, by incorporating options for cost-effective, practical, and immediately available, alternative-fuel motor vehicles such as natural gas-fueled vehicles (NGVs).	Comment noted.
150-02	Robert Cruz	Southern California Gas Company	Having a broad array of clean-fuel options makes sense for your member agencies given the diversity of your six counties and 191 cities. Many of your members have already made significant commitments to NGVs powered by clean, compressed natural gas (CNG), in terms of infrastructure, training and vehicle purchases. For example, as recently as last year, the LA County Metropolitan Transportation Authority retired its last diesel bus and now operates 2221 CNG-powered buses serving the	Comment noted. SCAG welcomes the opportunity to continue working with Southern California Gas Company to continue incorporating reasonable alternative energy strategies in future updates.

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			communities comprising the County of Los Angeles. This important decision was made within the context of financially constrained budgets, especially given the order of magnitude higher cost for purchasing, operating and maintaining electric and fuel-cell transit buses. Furthermore, since affordable near-zero vehicle technology is developing faster than fuel-cell and electric vehicle technology, it is imperative that more-effective, readily available, alternative-fuel options are included in the RTP/SCS as possibilities for all of your member agencies. SoCalGas would like to share data with SCAG staff on cost-effective, readily available near-zero vehicle technologies, such as NGVs. In the spirit of assisting SCAG in developing the most comprehensive and legally defensible RTP/SCS, the discussion below provides support for why SCAG should incorporate options for cost-effective, practical, and immediately available alternative-fuel motor vehicles such as NGVs, in its RTP/SCS.	
150-03	Robert Cruz	Southern California Gas Company	In addition, the RTP/SCS's current limitation of alternative-fuel vehicles to just fuel-cell and electric vehicles belies a narrow focus solely on tailpipe emissions. While it is true that ZEVs have zero tailpipe emissions compared to near-zero or low-emission vehicles (LEVs) such as NGVs, it would not be accurate to say that ZEVs generate zero emissions overall compared to low-emission vehicles. For example, electric vehicles receive their power from generating facilities that also generate combustion emissions. Emissions are also generated by the processes used to manufacture the special batteries needed for such vehicles. These emissions cannot be ignored nor discounted, particularly with respect to attainment of the National Ambient Air Quality Standard for ozone, or contributing to any new "or existing violation of any standard in any area." Furthermore, there is efficiency loss using electrical power rather than directly using natural gas to power vehicles. Indeed, in the course of producing useful electric energy in the U.S., "we waste or discard about 70 percent of the initial raw energy found in coal or most other fuel sources." It is more energy efficient, therefore, less wasteful and less polluting to directly use natural gas to power vehicles rather than generating electricity transmitted long distances over power lines and then used to power an electric vehicle. Therefore, energy efficiency should be taken into account to fulfill the SB 375 requirement for "a	Comment noted. While the RTP is required to be based on the vehicle fleet assumptions in ARB's EMFAC model, SCAG has sought to further the implementation of alternative fuels in a number of planning efforts, including applying for and receiving AB 118 funding. As discussed in the Goods Movement section of the RTP, the planning for a zero emission future includes the use of near-term alternative fuels and technologies as bridge to the long-term vision. For example, the SCAG Clean Cities Coalition is currently engaged with three projects that support and encourage the use natural gas as an alternative fuel. The Drayage- Natural Gas Truck Replacement Project involves the replacement of old, heavy-duty diesel drayage trucks with new trucks powered by clean natural gas engines, corresponding with the deployment of approximately 180 natural gas trucks. The Liquefied Natural Gas (LNG) - Corridor Expansion Project makes the final connection between the existing public access LNG fuel infrastructure in Southern California and the LNG fuel stations being developed in Utah, providing a 700-mile LNG fueling corridor along one of the nation's most heavily traveled goods movement truck routes between Southern California and Salt Lake City, Utah. And finally, the SANBAG/ Ryder Heavy Duty CNG Truck Replacement Project is funded with $19.2 million to deploy 262 natural gas trucks and construct two fueling stations. There are currently over 130 vehicles deployed, with

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			balanced" and "pragmatic," RTP/SCS.	fueling stations in development. Through Clean Cities, SCAG has shown a commitment to expand the use of a range of alternative fuels. SCAG looks forward to working with the Gas Company on these and future planning efforts.
150-04	Robert Cruz	Southern California Gas Company	2. AB 32 (Núñez 2006) - Global Warming Solutions Act The RTP/SCS needs to broaden its scope beyond electric vehicles and incorporate the use of alternative-fuel motor vehicles such as NGVs in order to be fully consistent with the policy objectives of AB 32, which is an overall reduction of California's greenhouse gases (GHG) emissions. As discussed above, energy is wasted when natural gas is used to generate electricity for electric vehicles, compared to natural gas used directly to power NGVs. In addition to this, using natural gas to generate electricity for electric vehicles creates more GHG emissions compared to natural gas used directly to power NGVs. This point is illustrated in a recent study which found that if you compared an electric-resistance water heater to a natural-gas water heater on a full fuel-cycle basis, the natural-gas water heater emits over 50 percent less CO2 equivalent emissions annually. Furthermore, the RTP/SCS also needs to be consistent with the goals of AB 32's low-carbon fuel standard (LCFS). The LCFS is designed to ensure the use of low-carbon transportation fuels in order to achieve the lower GHG levels intended by AB 32. This is achieved through the development of a carbon-intensity index which is measure of a transportation fuel's GHG emissions generated through its life cycle, i.e., GHG emissions generated from obtaining the fuel's raw materials, manufacturing the fuel, transporting the fuel from the producer to the ultimate consumer, and using the fuel. Electricity as a transportation fuel has a carbon-intensity index, as well as CNG, hydrogen, gasoline, and other transportation fuels. If the RTP/SCS solely focuses on fuel-cell and electric vehicles, and excludes other alternate-fuel vehicles, such as NGVs that have lower carbon-intensity index values, it would be inconsistent with the broader GHG reduction goals of AB 32, which is the law that forms the very foundation for SB 375 and the SCS requirement.	Comment noted. The SCAG Clean Cities Coalition is currently engaged with three projects that support and encourage the use natural gas as an alternative fuel. The Drayage- Natural Gas Truck Replacement Project involves the replacement of old, heavy-duty diesel drayage trucks with new trucks powered by clean natural gas engines, corresponding with the deployment of approximately 180 natural gas trucks. The Liquefied Natural Gas (LNG) - Corridor Expansion Project makes the final connection between the existing public access LNG fuel infrastructure in Southern California and the LNG fuel stations being developed in Utah, providing a 700-mile LNG fueling corridor along one of the nation's most heavily traveled goods movement truck routes between Southern California and Salt Lake City, Utah. And finally, the SANBAG/ Ryder Heavy Duty CNG Truck Replacement Project is funded with $19.2 million to deploy 262 natural gas trucks and construct two fueling stations. There are currently over 130 vehicles deployed, with fueling stations in development. Through Clean Cities, SCAG has shown a commitment to expand the use of a range of alternative fuels. We look forward to working with the Southern California Gas Company on future endeavors. SCAG's position is neutral towards zero or near-zero emissions technology. SCAG supports any and all such technology and related policies.
150-05	Robert Cruz	Southern California Gas Company	3. AB 118(Núñez 2007), amended by AB 109 (Núñez 2008) - Alternative and Renewable Fuel and Vehicle Technology Program Assembly Bill 118 created and authorized the California	Comment noted. While the RTP is required to be based on the vehicle fleet assumptions in ARB's EMFAC model, SCAG has sought to further the implementation of alternative fuels in a

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			Energy Commission (CEC) to "develop and deploy innovative technologies that transform California's fuel and vehicle types to help attain the state's climate change policies." With an annual budget of $100 million, the CEC must accomplish this goal by, among other things, funding projects that provide for "a measurable transition from the nearly exclusive use of petroleum fuels to a diverse portfolio of alternative fuels" (emphasis added). Over the last three years, the CEC has allocated AB 118 funding to a variety of projects including, but not limited to, installing electric vehicle-charging stations, installing CNG dispensing facilities, deploying the use of heavy-duty natural-gas vehicles and promoting biofuels such as biomethane. For 2012-13, CEC is planning to spend $2.5 million on new CNG refueling facilities, $12 million for NGV incentives and $20 million towards the production of biomethane. In order not to undermine the gains made by AB 118 and devalue the substantial investments made by the CEC in CNG refueling infrastructure, NGVs, and biomethane, SCAG should incorporate a diversity of alternative-fuel motor vehicles into the RTP/SCS, including NGVs. It would be a sad waste of public funds and resources if the RTP/SCS did not become more diverse and better align its goals with those of AB 118.	number of planning efforts, including applying for and receiving AB 118 funding. As discussed in the Goods Movement section of the RTP, the planning for a zero (or near zero) emission future includes the use of near-term alternative fuels and technologies as bridge to the long-term vision. For example, the SCAG Clean Cities Coalition is currently engaged with three projects that support and encourage the use natural gas as an alternative fuel. The Drayage- Natural Gas Truck Replacement Project involves the replacement of old, heavy-duty diesel drayage trucks with new trucks powered by clean natural gas engines, corresponding with the deployment of approximately 180 natural gas trucks. The Liquefied Natural Gas (LNG) - Corridor Expansion Project makes the final connection between the existing public access LNG fuel infrastructure in Southern California and the LNG fuel stations being developed in Utah, providing a 700-mile LNG fueling corridor along one of the nation's most heavily traveled goods movement truck routes between Southern California and Salt Lake City, Utah. And finally, the SANBAG/ Ryder Heavy Duty CNG Truck Replacement Project is funded with $19.2 million to deploy 262 natural gas trucks and construct two fueling stations. There are currently over 130 vehicles deployed, with fueling stations in development. Through Clean Cities, SCAG has shown a commitment to expand the use of a range of alternative fuels. SCAG looks forward to working with the Gas Company on these and future planning efforts.
150-06	Robert Cruz	Southern California Gas Company	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 80.
150-07	Robert Cruz	Southern California Gas Company	1. SB 375 (Steinberg, 2008) - Addressing Greenhouse Gas Emissions from the Transportation Sector via Regional Transportation Plans The RTP/SCS needs to incorporate the use of other alternative-fuel vehicles, such as NGVs in order to fully meet all of SB 375's requirements. This is because SB 375 requires plans such as the RTP/SCS to be "balanced" and "pragmatic," and to consider "both the short-term and long-term future." Consequently, the RTP/SCS should incorporate cost-effective, practical, and immediately accessible alternative-fuel motor vehicles such as NGVs. The planning and infrastructure necessary for deploying electric and fuel-cell	Comment noted.

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			vehicles is an extremely resource-intensive and long-term process. Indeed, if the RTP/SCS were to mandate solely electric and fuel-cell vehicles, then SCAG would be making the same mistakes that CARB made when it implemented its Zero Emission Bus (Z-Bus) program ten years ago. CARB adopted the Z-Bus program in 2000 as part of its Transit Fleet Rule which basically requires transit-bus fleets (with over 200 buses) to have by 2010, 15% of their new bus purchases be Z-Buses, such as battery-electric or fuel-cell buses, or electric trolleys. Over the last ten years, however, a number of demonstration projects conducted by a number of large transit agencies showed that these Z-Buses were very expensive, performed poorly, were unreliable, and its key components (batteries, fuel-cells) were extremely expensive to replace with a very short life span, e.g., a fuel-cell has a life span of 5,000 hours and costs over $1 million to replace. In September 2010, Foothill Transit took delivery of three battery-electric powered Z-Buses, costing $1 million each. Each bus had a 30-mile range requiring a 10-minute recharge period. Worse, the recharging periods for these electric buses would occur during peak-electric periods when electricity is at highest cost and potentially overloading already strained California power grids. As a result, CARB is in the process of revising the Z-Bus rule to allow for greater flexibility and to give the bus-transit agencies more time. Therefore, in order for the RTP/SCS to succeed in meeting the requirements of SB 375, it must take note of what CARB learned from its Z-Bus program and broaden its scope beyond just fuel-cell and electric vehicles, to include other alternative-fuel vehicles such as NGVs.	
151-01	Richard Lambros	Southern California Leadership Council	On behalf of the Southern California Leadership Council (SCLC), we would like to acknowledge the Southern California Association of Governments (SCAG) and both its staff and leadership who have worked diligently to prepare the Draft 2012 Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS) Program Environmental Impact Report (PEIR), and associated documents. This first of its kind effort, as called for under SB 375, has taken over three years and involved an unprecedented level of collaboration between SCAG and its public and private sector stakeholders from throughout the region. The degree of outreach and engagement	Comment noted. Please see responses to specific comments.

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			is exceptional and SCAG should be applauded for its efforts. As you know, the Southern California Leadership Council is a non-partisan, non-profit, business-led public policy partnership. The Leadership Council exerts strong leadership on issues of regional significance, providing a common voice on major public policies critical to economic vitality, job growth and quality of life in Southern California. The Leadership Council unites business and community leaders from throughout the seven-county region into one effective leadership organization whose membership includes three former California governors and two dozen presidents and CEO's of top Southern California companies. SCLC appreciates its strong working relationship with SCAG and its ability to provide business and industry input into SCAG policies and initiatives. In particular, SCLC has been an active participant in the over three year long process of crafting and developing the RTP/SCS. Based on this extensive involvement, SCLC offers the following general comments and recommendations on the draft plan and requests that this letter be included in public record as our collective comments on the Draft RTP/SCS, PEIR and associated documents.	
151-02	Richard Lambros	Southern California Leadership Council	SCLC's Position – SCLC supports a 2012 RTP/SCS that recognizes the critical importance of transportation and infrastructure to economic vitality, job creation and the quality of life for all Southern Californians. We also support an RTP/SCS that honors market forces, local control and flexibility as it works to secure an integrated approach to land use, transportation, housing and environmental planning in order to achieve GHG emission reductions under the SCS. In evaluating SCAG's Draft 2012 RTP/SCS to determine if it is such a plan, from early on SCLC has applied a consistent set of policies and principles related to good planning, to assure that the RTP/SCS is a smart, feasible, flexible, accountable plan that is CEQA compliant, economically sound and preserves existing employment and enhances job creation. The following is the specific set of key policies and principles that SCLC and others in the business community have applied in evaluating the plan; and we believe that they represent the qualities of a good and sound RTP/SCS.	Comment noted.
151-03	Richard Lambros	Southern California Leadership	Provides Positive Economic Impacts … A Plan that is Pro Economic Growth and Job Creation – The RTP/SCS must undergo a true economic cost/benefit analysis so that economic	Comment noted. Economic and Job Creation Analysis has been updated to provide a more comprehensive assessment of the benefits and impacts of the 2012-2035 RTP.

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		Council	impacts are understood and known by both SCAG Regional Council members and stakeholders well before making a final decision on the RTP/SCS.	
151-04	Richard Lambros	Southern California Leadership Council	Provides Local Control: o Any new transportation revenues or fees collected must be under the control of the local transportation agency/authority. o Cities, counties and local transportation agencies must maintain appropriate control and flexibility in managing decisions and resources related to land use, transportation and community development.	Comment noted. We agree that accountability is a critical consideration for any new revenue sources. The RTP does not assume nor would it result any changes in control of transportation revenues that would diminish local transportation agency/authority powers nor provide any new powers to SCAG.
151-05	Richard Lambros	Southern California Leadership Council	Assures New Revenue Sources are Fair, Equitable and Economically Sound – New transportation revenue concepts within the RTP/SCS must undergo cost/benefit and other appropriate analysis to assure that they are economically sound. They must also be fair and equitable, meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement.	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
151-06	Richard Lambros	Southern California Leadership Council	Is Balanced and Accountable – The plan's call for new revenue is balanced with performance measures, reforms and guarantees that assure the RTP/SCS is effective, efficient and responsible to the citizens and taxpayers of Southern California.	Comment noted. The 2012 RTP is a performance based multi-modal plan that incorporates transit, highway, and active transportation strategies to achieve overall improved system performance.
151-07	Richard Lambros	Southern California Leadership Council	Is CEQA Compliant and Defensible – The RTP/SCS is processed correctly from an environmental impact perspective and built to withstand a CEQA Challenge.	Comment noted.
151-08	Richard Lambros	Southern California Leadership Council	Provides for CEQA Streamlining and Protects Against CEQA Abuse – The plan is crafted so as to capture and make feasible all available CEQA benefits, especially streamlining, while also anticipating and limiting opportunities for CEQA abuse.	Comment noted.

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151-09	Richard Lambros	Southern California Leadership Council	SCLC's Comments and Recommendations – In measuring the draft plan against these key policies and principles, we find many very positive aspects of the RTP/SCS – especially those related to the plan's core principles, approach and direction. Likewise, we find a number of other aspects of the Draft 2012 RTP/SCS in need of much more consideration, correction and clarification before SCAG finalizes and approves the plan. Most notable among our concerns is the Draft PEIR, which we believe is in need of significant amendment in order to be more in-line with the same core principles, approach and direction reflected in the Draft RTP/SCS. Outlined below, in very general terms, are SCLC's comments and recommendations related to specific aspects of the Draft RTP/SCS and PEIR that we believe need to be addressed and corrected in the final plan documents.	Comment noted. See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 81.
151-10	Richard Lambros	Southern California Leadership Council	2. Transportation Analysis Zones (TAZs) –The Draft RTP/SCS suggests (on page 148 of the draft SCS particularly) that future policy conformity determinations should be made by comparing projects with some undisclosed data set related to the projected dispersion of populations and employment, shown and categorized at the level of sub-jurisdictional "transportation analysis zones." The TAZ level of detail is, we believe, too small and precise a level at which to prescribe policy outcomes concerning the spatial dispersion of development and redevelopment, particularly in light of the regional nature of the RTP/SCS. The SCS should, therefore, be clarified to indicate that questions of consistency with the RTP/SCS should be substantively measured and determined at a jurisdictional or subregional level, not at a TAZ level.	Comment noted. The TAZ-level maps have been developed for the purpose of modeling performance. Lead agencies, including local jurisdictions, maintain their own discretion in how to determine consistency of any future project with the SCS. The growth assumptions for the RTP/SCS are proposed to be adopted at the jurisdiction level.
151-11	Richard Lambros	Southern California Leadership Council	3. New Revenue Sources – The Draft RTP/SCS needs to provide more detail, clarity and explanation concerning the new revenue sources that are outlined within the plan document. New revenues account for $219.5 billion out of the total $524.7 billion needed for the transportation plan, yet there is very little detail explaining these significant new fees and impositions (see page 95 & 96 of the Draft RTP/SCS). To evaluate these proposals fully and fairly, the business community and all stakeholders need the benefit of additional detail and explanation. In particular, we need clarity and assurance regarding the following: a. The new revenue concepts assumed within the RTP/SCS must be fair, equitable and economically sound,	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available

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			meaning that an appropriate nexus exists to assure that new revenues are drawn fairly and proportionally from those who benefit from the related transportation infrastructure or improvement. b. The new revenue sources within the RTP/SCS must be effectively allocated, meaning the plan should clearly articulate how resources will be efficiently and responsibly allocated so that there is the best possible return on investment for the expenditure of these new transportation funds. SCAG needs to show that it will be a responsible, accountable and innovative steward of the new revenues that it is proposing.	funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
151-12	Richard Lambros	Southern California Leadership Council	4. Federal Level Fee Imposition – New revenues from fees on businesses operating in the SCAG region – and particularly the "Freight Fee/National Freight Program" listed on page 96 of the Draft RTP/SCS – need to be developed and implemented at the federal level, not the local and regional level. Unless such fees are imposed on a national scale, the region's competiveness will be compromised.	Comment noted. The RTP/SCS does not assume the implementation of local, regional, or statewide freight fees. Ensuring that the SCAG region or its member entities are not at an economic disadvantage were critical considerations used in the development of all funding proposals included in the RTP.
151-13	Richard Lambros	Southern California Leadership Council	5. Goods Movement – In the RTP/SCS, SCAG should identify and highlight the significant economic contributions of the goods movement sector to the regional and state economy. Specifically, the RTP should acknowledge that, as business stakeholders work with regulatory agencies to further reduce emissions in the SCAG region, any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, or reliability of the goods movement system.	Comment noted. SCAG recognizes the significant contribution of the goods movement sector to the regional and state economy. SCAG concurs that any technology introduced must not compromise the safety, velocity, cargo throughput, economic competitiveness, and reliability of the goods movement system. SCAG will continue to work with all goods movement stakeholders in further evaluating technology options.
151-14	Richard Lambros	Southern California Leadership Council	6. Economic Analysis of the Draft RTP/SCS – Throughout the process of developing the RTP/SCS and especially in the last few months leading up to the release of the Draft Plan, SCLC regularly called for a valid economic analysis of the plan – one which would provide a true cost benefit analysis. It should be noted that SCLC was not the only one concerned about the plan's potential economic impact. In fact, this past summer, when SCAG conducted a series of 18 RTP/SCS Public Outreach Workshops, a majority of participants indicated that the economy was the most important priority for the region – finishing ahead of transportation and the environment. As a result of this and the clear linkage between the RTP/SCS and the economy, SCAG deployed a team of outside economists to do a complete economic impact analysis of the Draft RTP/SCS. SCLC	Comment noted. The Economic and Job Creation Analysis Appendix has been updated as part of the final RTP/SCS to provide a more comprehensive assessment of the benefits and impacts of the 2012-2035 RTP/SCS.

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			applauds SCAG's commitment to providing thorough economic analysis, including an evaluation of the plans impact on jobs and job creation. With the work of the economists now mostly complete, their impact analysis of the plan has produced some extremely positive data, showing the costs of the plan to be far exceeded by the benefits the RTP/SCS will provide in the way of job creation and economic growth in our region. SCLC strongly encourages SCAG to widely communicate this economic data and to be sure and include all appropriate new economic data sets and analysis in the final RTP/SCS.	
151-15	Richard Lambros	Southern California Leadership Council	7. Phase II Economic Recovery Strategy – SCLC agrees with SCAG's GLUE Council, that if SCAG utilizes the work done last year to develop and adopt SCAG's first ever regional Economic Recovery Strategy and couples this with the outstanding economic analysis conducted by SCAG in support of the RTP/SCS, SCAG is well positioned to develop a Phase II Economic Recovery Strategy as a companion measure for adoption in conjunction with (or shortly thereafter) the final RTP/SCS. The Phase II Economic Strategy would be a way for SCAG, its GLUE Council, local government the business community and other stakeholders to come together and support critically necessary regulatory reforms and strategies to help reinvigorate the region's economy and support the full implementation of the RTP/SCS. The Phase II Strategy would also give SCAG and GLUE a vehicle for establishing a true Regional Economic Plan to go along with SCAG's other regional plans such as the RTP, the SCS and RHNA.	Comment noted.
151-16	Richard Lambros	Southern California Leadership Council	Conclusion – While SCLC finds a number of very positive aspects in the plan, especially related to principles and direction, there is still work to be done, significant issues to be addressed, and details to be developed. With this in mind, SCLC is committed to completing this process and working closely with SCAG. Just as it has done over the multi-year process that has lead up to the Draft RTP/SCS and PEIR, SCLC will remain very active and engaged on this issue throughout the remainder of the process as we work together to finalize and approve a 2012 RTP/SCS and PEIR for our region that is business friendly, economically viable, promotes job creation and enhances the quality of life for all Southern Californians.	Comment noted. SCAG looks forward to continuing our partnership with SCLC.
151-17	Richard	Southern	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to

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	Lambros	California Leadership Council		Comments on the Draft RTP PEIR, Letter Number 81.
152-01	Richard Lambros	Southern California Leadership Council	As the SCLC evaluates the RTP there are six core principles that we believe should be present in a good RTP/SCS: • Needs to revive positive economic impacts. SCAG has done some economic analysis and the SCLS would ask that Staff complete the analysis as soon as possible and make it widely available both to stakeholders and to Regional Council members so everyone can have the full benefit of the economic impacts. However at this point the analysis we are seeing looks very positive. • Needs to provide local control • Assure that new revenue sources are fair, equitable and economically sound • Needs to be balanced and accountable • CEQA compliant and defensible, especially given some recent lawsuits against the SANDAG RTP • Needs to provide CEQA streamlining and protect against CEQA abuse	Comment noted. The Transportation Finance Appendix provides additional detail and explanation on all revenue sources included in the RTP. We considered the following key guiding principles as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies: • Establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits. • Promote national and state programs that include return-to-source guarantees while maintaining flexibility to reward regions that continue to commit substantial local resources. • Leverage locally available funding with innovative financing tools (e.g., tax credits and expansion of TIFIA) to attract private capital and accelerate project delivery. • Promote funding strategies that strengthen federal commitment to the nation's goods movement system, recognizing the pivotal role that our region plays in domestic and international trade. The investments in the RTP provide a return of $2.90 for every dollar invested.
152-02	Richard Lambros	Southern California Leadership Council	I call upon SCAG to look closely at the local impute, make sure that local impute actually matches up with approvals on the ground. As SCLC looked at the mapping, we noticed a lot of scenarios where local approved plans for development are not reflected in the mapping. That will create a significant problem further on.	Comment noted. SCAG's SCS is based upon local input from local jurisdictions and SB 375 does not require that a jurisdiction's land use policies and regulations, including its general plan, be consistent with the SCS. In some cases, SCAG altered small area land use assumptions to better reflect recent trends occurring in many transit-rich areas of the region.
153-01	Karen Sakoda	Southern California Regional Rail Authority	RTP Page 5 - We understand that Metrolink's list of constrained projects is included in the $3.9 billion Transportation Investment cost for commuter rail, along with other commuter rail projects submitted by the County Transportation Agencies.	Comment noted.
153-02	Karen Sakoda	Southern California Regional Rail Authority	RTP Page 21 - In addition to the four routes mentioned that share portions with the LOSSAN corridor, the Antelope Valley Line shares a segment between Los Angeles Union Station and Burbank Junction. We also recommend removing the reference to the Dodger trains, and replacing the team name with a more general reference to trains for sporting events, and other special events.	Comment noted. The Final RTP incorporates this comment.
153-03	Karen Sakoda	Southern	RTP Page 51 - Recommend modifying wording that states	Comment noted. The Final RTP incorporates this comment.

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		California Regional Rail Authority	existing rail service will eventually meet 110 mph. Speeds will vary considerably depending on track configuration and geography, and 110 mph may be attained where safely possible.	
153-04	Karen Sakoda	Southern California Regional Rail Authority	Page RTP 53 - Improvements to the LOSSAN Corridor section contains a sentence "... AVL travel time between Palmdale and LAUS can be shortened by 33% simply by skipping less used station stops." Recommend revising AVL express train wording to state, "travel time could be shortened by 25% by skipping selected station stops..."	Comment noted. The Final RTP incorporates this comment.
153-05	Karen Sakoda	Southern California Regional Rail Authority	RTP Page 73 - Goods Movement Rial Strategy - We support expansion of the rail system to accommodate anticipated increases to freight and passenger rail services. Funding capacity expansion, safety improvements and grade separation projects will be crucial to meeting regional goals.	Comment noted.
153-06	Karen Sakoda	Southern California Regional Rail Authority	RTP Page 84 - For new projects that result from implementation of the RTP, noise mitigation measures should be addressed through associated project environmental reviews.	Comment noted. Language has been clarified to reflect intent that the mitigation measures may be considered by project implementing agencies when feasible and appropriate.
153-07	Karen Sakoda	Southern California Regional Rail Authority	RTP Page 184 - Environmental Justice Mitigation Toolbox - Rail Related Impact mitigations pose some challenges. We cannot support the recommendation that rail operators improve the acoustical insulation of dwelling units where setbacks and sound barriers do not sufficiently reduce noise. Also, recommending speed limits and limits on the hours of operation to mitigate noise inhibits Metrolink's ability to operate and expand.	Comment noted. The referenced noise mitigation measures in the final version of the Environmental Justice Mitigation Toolbox have been deleted.
153-08	Karen Sakoda	Southern California Regional Rail Authority	RTP Page 197 - Greater Vision for our Commuter Rail System - Tex states that Metrolink operates 164 trips on weekdays. Currently, Metrolink operates 163 trips per weekday. Also, the document states, "With the investments proposed within the Constrained Plan, we except to achieve more than double the ridership by 2035." Recommend adding investments proposed in the Strategic Plan which are also necessary to achieve the stated ridership growth.	Comment noted. The Final RTP incorporates this comment.
153-09	Karen Sakoda	Southern California Regional Rail Authority	Passenger Rail, Page 5 - Text states that Metrolink operates 164 trips on weekdays. Currently, Metrolink operates 163 trips per weekday.	Comment noted. The Final RTP incorporates this comment.
153-10	Karen Sakoda	Southern	Passenger Rail, Page 10 - Recommend clarifying which	Comment noted. The Final RTP incorporates this comment.

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		California Regional Rail Authority	"Authority" is being discussed. It is sometimes not clear whether the Authority is the HSR Authority, or SCRRA.	
153-11	Karen Sakoda	Southern California Regional Rail Authority	Passenger Rail, Page 20 - Recommend adding wording to include investments in the Constrained Plan and the Strategic Plan to achieve a doubling of ridership by 2035.	Comment noted. The Final RTP incorporates this comment.
154-01	Stephen Rogers	Stephen W Rogers P.E. Consulting	Thank you and SCAG for this opportunity to provide written public comments pertaining to the subject Draft PEIR document for the 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/ SCS) document, dated December 2011. The following additional mitigation measures and sustainable community strategies are proposed for SCAG's consideration and inclusion in the Final Program Environmental Impact Report (PEIR), as appropriate: 1. The Friendly Communities program is being developed as a private public partnership, to focus on the needs and quality of life issues unique to residents of unincorporated area communities, and other communities of special interest. This program could be replicated statewide/ nationwide.	Comment noted. See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 88.
154-02	Stephen Rogers	Stephen W Rogers P.E. Consulting	2. A Countywide Vehicle Asset Management Plant Program (VAMPP) should be considered for strategic location along major routes within the regional highway network, to improve the implementation of standardized maintenance programs for governmental, transit and private fleet asset services management. This program could be replicated statewide/nationwide.	Comment noted.
154-03	Stephen Rogers	Stephen W Rogers P.E. Consulting	3. Technological advances in vehicle, truck and heavy equipment lubrication, translating into significant emissions reductions and extended oil service drain intervals, can be realized by the use of Synthetic Lubricants and fleet conversion to bypass filtration. In a recent study, reported December 2011,Amsoil Synthetic Lubricants Increased Fuel Economy 6.54 % in diesel trucking applications	Comment noted.
154-04	Stephen Rogers	Stephen W Rogers P.E. Consulting	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 88.
155-01	Stephen Rogers	Stephen W Rogers P.E.	The comments I would like to express and share with regard to quality of life issues through a more efficient transportation	Comment noted.

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		Consulting	system and a more sustainable system overall. Housing plays a big role in transportation. Lately, there hasn't been an influx into Southern California as there has been in the past and so these growth forecasts need to be examined and I know there is some work ongoing in that area. Since it has such a great impact on the needs for transportation systems whether it be the highways, airports, rail, any of that – we need to make sure we have reasonable numbers, reasonable forecasts, and I see this leading to the big picture which is the quality of life for Southern California.	
155-02	Stephen Rogers	Stephen W Rogers P.E. Consulting	We are all financially strapped right now, and the last thing we look for is to pay more to be able to drive on a freeway. I think it is certainly something that should be examined to show that SANBAG, SCAG, and other agencies are spending our tax money, gas tax money and federal money in an appropriate way. Then I think we would be willing to go along with this Plan. But right now, I think it is a big reach for anybody to say we are willing to start paying to drive on freeways.	Comment noted. Our current freeway system was financed and continues to be maintained by revenues collected through state and federal gas taxes, local sales tax measures, and other sources. The RTP would not impose any fees or tolls on existing general purpose freeway lanes.
156-01	Stephen Rogers	Stephen W Rogers P.E. Consulting	Thank you and SCAG for this opportunity to provide written public comments pertaining to the subject Draft PEIR document for the 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/ SCS) document, dated December 2011, and Federal Transportation Improvement Program (FTIP) Proposed Amendment # 's 11-24, -20: The following highway projects in the City of Redlands area of San Bernardino County, have been mistakenly left out of the identified FTIP projects lists and associated RTP/SCS documents: 1. Redlands Boulevard/ Colton Ave./ Alabama St./ RR-X's (SanBAG) Intersection(s) reconstruction 2. San Bernardino Avenue/ I-210 Freeway Interchange Upgrade (impacting proposed Redlands Crossing (Super WalMart) development (see comment letter pertaining to Redlands Crossing Draft Environmental Impact Report, attached.) 3. Alabama Street/ I-10 Freeway Interchange Upgrade	1) This project is programmed under FTIP ID# 20081704 and is included on the posted Project List. 2) SANBAG has not yet programmed this project in the FTIP. It may be included in SR210/between Highland and I-10 in the future as specific details of the IC at this location remain to be worked out. 3) This project is included in the RTP and in the posted Project List under RTP ID# 4M01025. However, SANBAG has not yet programmed this project in the FTIP.
157-01	Steve Bennett	Supervisor, First District, County of Ventura	Dear Sirs & Madams: While the RTP generally does a sound job of planning for the future transportation needs of our region, I must take exception to the proposed allocation of a mere 1.3% of transportation funding for so called "active transportation." I would encourage that a minimum of 5-8% of funding be devoted to pedestrian and bicycle facilities. First, SB 375	Comment noted. While achieving the SB 375 mandate to reduce greenhouse gas emissions can at least partially be achieved through automobile trip reduction, SB 375 does not mandate automobile trip reduction. Increased investment in active transportation may result in reduced automobile trips, which in turn could reduce greenhouse gas emissions. Based on public

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			mandates that that the RTP address trip reduction. With only 1.3% of funding devoted to active transportation, this mandate is not being adequately satisfied. Second, public safety demands a greater allocation for active transportation. With 25% of traffic fatalities involving bicyclists or pedestrians, clearly far more must be done to protect the public. Lastly, the convergence of global warming, increasing fuel costs, declining personal incomes, and the obesity epidemic all point towards an overwhelming need to greatly expand the non-motorized transportation infrastructure in our region. Expanding the SCAG region's bicycle and pedestrian network must be accomplished at the same time as other transportation facility improvements, and proceed in concert with the growth of our region in a planned and coordinated manner . For these reasons, I encourage revision of the RTP to identify major nonmotorized transportation needs, corridors, and linkages, and to allocate a minimum of 5-8% of transportation funding to active transportation. Cordially, Steve Bennett Supervisor, First District County of Ventura	input requesting additional funding for active transportation, the 2012 RTP increased funding for active transportation from $1.8 billion in the 2008 RTP to $6.7 billion in the 2012 RTP. Much of this increase in funding for active transportation is tied to the state and federal gas excise tax adjustments to maintain historical purchasing power and mileage-based user fee since portions of those revenue sources would be available for funding active transportation investments.
158-01	Will Wright	The American Institute of Architects	On behalf of the Los Angeles chapter of the American Institute of Architects (AIA|LA), I am writing to express our thoughts on the draft 2012 – 2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP). With great respect for the process to draft such a comprehensive plan, we commend you on the progress made so far. As AIA|LA supports smart growth policies that facilitate infill development projects and concentrate our investments in areas that sustain the vibrancy of the urban core, we encourage you to adopt Alternative 3 (Envision 2 Alternative) of the draft plan. This option will foster smart growth land use and housing patterns to achieve superior environmental results in air quality, aesthetics, open space and farmland preservation, water conservation, greenhouse gas emissions reductions, mobility, and land use.	Comment noted.
158-02	Will Wright	The American Institute of Architects	Transit projects and active transportation investments should take precedent over highway expansion projects. Infill development and transit-first policies are natural allies of each other. Accelerating transit infrastructure and associated joint-use, mixed-income development also helps our region achieve its social, economic and cultural development goals.	Comment noted. The 2012 RTP/SCS dedicates $55.0 billion to transit capital projects, $51.8 billion to passenger rail capital projects, $6.7 billion to active transportation and $139.3 in transit operations and maintenance funding.
158-03	Will Wright	The American	AIA|LA is concerned that the current draft plan provides for a	Comment noted. The Draft RTP provides 11.2 percent of total

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		Institute of Architects	disproportionate share of funds towards highway capacity improvement that will facilitate greenfield development. The consequence of additional freeway lanes will be more VMT and more sprawl, with the associated air quality and infrastructure maintenance requirements. Environmentally and economically, facilitating more compact urban development and design conserves our natural resources and our tax dollars. In short, adopting the Envision 2 Alternative Plan will help S.C.A.G. emphasize its leadership role to shape emerging land-use and transportation plans. Moving forward we invite the S.C.A.G. Board of Directors and staff to work with AIA|LA to shape an environmentally healthy and economically compelling vision for the future of Southern California.	funding towards traditional highway capacity improvements, including arterials, high occupancy vehicle lanes, mixed flow lanes, and interchange improvements. By contrast, transit capacity expansion (excluding operations and maintenance) accounts for 20.4 percent of the total RTP funding. The alternative plan recommended in the comment is not fiscally constrained.
159-01	Will Wright	The American Institute of Architects	The AIA strongly encourage SCAG to reprioritize the funding allocations away from highways and into transit.	Comment noted.
159-02	Will Wright	The American Institute of Architects	We encourage you to recommend a 10% allocation to active transportation something that will make the region not only more economically competitive but will also make it a healthier place.	Comment noted.
159-03	Will Wright	The American Institute of Architects	With regards to the process, is this RTP an accumulation of all the plans that are currently already out there or is there truly some vision behind it? If we look at ourselves in the year 2040, will we be in a place that we really want to be in or are just in a place that we are going towards right now and not really taking the measures to sort of shift course. With regards to the vision, there is an opportunity for SCAG to engage the architecture community a little more in depth and bring forward some of the livability and lifestyle issues that are at present being reduced to the conversation about traffic. This is not about traffic, this is about human conditions, this about lifestyle, this is about the type of place we want to live in, be in, and to experience as a human. Some of the questions I have been receiving from the people I represent in my role on AIA is questioning what is the urban design intelligence that is currently inherent in the RTP? Is there urban design intelligence, is there any concern with what it is actually like to be standing on your own two feet around some of these major investments that we are making? I think there is a true opportunity perhaps to learn a little bit through this process when we revisit a new plan for the future	Comment noted. After Plan adoption, we will continue to work with our stakeholders to identify appropriate metrics for analyzing and monitoring key assumptions and outcomes.

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			of the Southern California region to really start to think about what is the future like and how do we come back and change our implementation strategies so that we get to where we want to be as opposed to simply following the path to where we think we need to be based on the funding priorities that we have already set.	
160-01	Penny Newman	The Center for Community Action and Environmental Justice	The technologies mentioned must be required for future projects and incorporate these technologies or they should not be built.	Comment noted. SCAG will continue to work with regional partners and stakeholders and local communities to identify and advance appropriate strategies to reduce the emissions and negative impacts of freight movement on residents throughout the SCAG region.
160-02	Penny Newman	The Center for Community Action and Environmental Justice	The Center for Community Action and Environmental Justice appreciates the efforts of the Southern California Association of Governments (SCAG) in completing the Draft 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS). We are encouraged by the concerted efforts put forth in the draft towards improving the transportation system which also includes some measures to address Public Health and Air Quality in our region. We have joined with other concerned organizations to outline comments on the plan and incorporate those comments with ours, however we do have some specific concerns which we feel will directly impact our communities in the City of Jurupa Valley (formerly known as unincorporated Mira Loma community in Riverside County) and the City of San Bernardino Westside communities.	Comment noted.
160-03	Penny Newman	The Center for Community Action and Environmental Justice	The communities in the Jurupa area have for many years seen an influx of warehousing slowly encroaching into our neighborhoods. Many of these projects are at the fence line of homes and schools. Residents in close proximity to highways, and busy streets with high levels of diesel truck traffic, will experience increased incidents of asthma, cancer risks, cardiovascular and respiratory disease, premature mortality, decreased life expectancy, reproductive health problems.	Comment noted. The RTP/SCS evaluates region-wide impacts on various demographic groups. New to the Title VI and Environmental Justice analysis for the 2012 RTP/SCS, SCAG has mapped exposure to ozone, concentration of particulate matter emissions, cancer risks, and respiratory hazard risks. In order to assess the impact of emissions on various demographic groups throughout the region, emissions information was summarized to the Environmental Justice communities. Please note that the RTP/SCS exposes the SCAG region to fewer emissions compared to the no plan alternative and today's current conditions. In addition, the Program Environmental Impact Report for the RTP/SCS included a Health Risk Assessment in Appendix F.
160-04	Penny Newman	The Center for Community	Components of the Regional Goods Movement System SCAG has addressed the fact that the Inland Valley is already home to	Comment noted. As noted in previous responses, the RTP/SCS evaluates impacts on various demographic groups. New to the

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		Action and Environmental Justice	(2008) about 837 million square feet of warehousing space with another 185 million square feet in developable land. An estimated 15 percent of the occupied warehouse space served port-related uses while the remaining 85 percent supported domestic shippers. National and regional distribution facilities tend to be located in the Inland Valley and concentrated in the Jurupa Valley/Fontana area. The impacts to the surrounding communities from the diesel spewing trucks drawn to these warehouses create severe health outcomes and disruption of the quality of life for local families. SCAG must address these impacts in a significant manner as to minimize to the furthest extent possible the environmental and health risks posed from exposure to diesel exhaust.	Title VI and Environmental Justice analysis for the 2012 RTP/SCS, SCAG has mapped exposure to ozone, concentration of particulate matter emissions, cancer risks, and respiratory hazard risks. In order to assess the impact of emissions on various demographic groups throughout the region, emissions information was summarized to the Environmental Justice communities. Additional analysis has been included in SCAG's Final Environmental Justice (EJ) Appendix that measures the health and emissions impacts for populations less than five years of age. Included in this section will be the existing cancer and respiratory risk for areas with high concentrations of young children, along with projected emissions impacts from the RTP on young children for those who live within 500 feet of the region's freeways and highly traveled corridors. In addition, the Program Environmental Impact Report for the RTP/SCS included a Health Risk Assessment in Appendix F.
160-05	Penny Newman	The Center for Community Action and Environmental Justice	The implementation of specific truck routes to keep truck traffic away from communities of concern as project specific strategies tend not to address specific impacts to these communities.	Comment noted. SCAG will continue to work with regional partners and stakeholders and local communities to identify and advance appropriate strategies to reduce the emissions and negative impacts of freight movement on residents throughout the SCAG region.
160-06	Penny Newman	The Center for Community Action and Environmental Justice	Other measures such as establishment of green zone/buffer area between diesel sources and residents of at least 1000 feet are necessary to be protective of residents in close proximity.	Comment noted. The Environmental Justice mitigation toolbox is not an exhaustive list of measures. It provides a sample of potential measures that could be voluntarily selected by project sponsors where appropriate and feasible. The noise measures do include a recommendation to construct sound reducing barriers between noise sources and noise-sensitive land uses.
160-07	Penny Newman	The Center for Community Action and Environmental Justice	Additional mitigation measures of trees and foliage that help to trap many of the ultra fine particles to lessen the impacts to communities of concern, sound walls to lessen the noise pollution from residential areas that are too close to freeways and heavily traveled thoroughfares.	Comment noted. The noise measure in the Environmental Justice Mitigation Toolbox presents an optional mitigation recommendation to construct sound reducing barriers between noise sources and noise-sensitive land uses. Implementation of this suggested measure, including if the barriers involve of trees and foliage, is at the discretion of the project sponsor.
160-08	Penny Newman	The Center for Community Action and Environmental Justice	Regional Clean Freight Corridor System The truck corridor that SCAG has proposed will heavily impact the inland valley communities as SCAG has indicated the increase of truck traffic to our area will grow from 58,000 to 70,000 trucks per day although these trucks would be removed from general purpose lanes when they get to Interstate 15 and State highway 60. That	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. This system also offers the opportunity to incentivize the adoption of clean, zero-emission technologies for regional freight movement. SCAG continues to

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			traffic will then be dumped into our communities at a rate that will create an even greater health crisis for our communities. The disregard for the impacts of the plan upon the Inland Valley communities south of the 15/60 interchange must be addressed. The residents can't wait until 2035 for a solution to this huge impact. Goods movement strategies must ensure that the South Coast air basin meet federal air quality standards set forth in the Clean Air Act.	work with and support efforts by regional partners and stakeholders to address goods movement emissions and impacts on communities.
160-09	Penny Newman	The Center for Community Action and Environmental Justice	The RTP/SCS must remove the East-West Corridor Route Project.	Comment noted.
160-10	Penny Newman	The Center for Community Action and Environmental Justice	Recommending building an east-west corridor without analyzing the health, housing and demographic impacts of the project on the neighboring communities can have severe environmental, health and justice implications for the entire region, and particularly for local communities of concern as previously stated.	Comment noted. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. Specific housing, health, and demographic impacts from the East-West Freight Corridor alignment identified as part of the 2012 RTP would be analyzed in more detail through a project level Environmental Impact Report (EIR).
160-11	Penny Newman	The Center for Community Action and Environmental Justice	Communities like the City of San Bernardino Westside are an example of one of the worst impacted by the BNSF Intermodal Rail yard which after a health risk assessment conducted in 2008 found that residents living in close proximity faced an increased cancer risk from diesel emissions as much as 15 times higher than the Union Pacific Railyard UP in Colton and 3 times higher than any other railyard in the region. To these residents the point of maximum impact is 3,300 people in a million are at greatest risk.	Comment noted. SCAG recognizes that some regional communities are more acutely affected by goods movement emissions than others. As a result, SCAG continues to encourage and support efforts by regional partners and stakeholders to address goods movement emissions and impacts on communities.
160-12	Penny Newman	The Center for Community Action and Environmental Justice	The RTP/SCS must focus attention on cleaning up existing freight corridors. Rail companies should not expand until rail yards like San Bernardino's BNSF Facility implement zero emissions technology. These communities with the highest health risk cannot wait until 2030 for solutions. As freight transport increases, SCAG must encourage the incorporation of evolving technologies to specific high risk areas first and not just for proposed new projects.	Comment noted. SCAG recognizes that some regional communities are more acutely affected by goods movement emissions than others. The East-West Freight Corridor is an example of goods movement project anticipated to reduce harmful emissions through the use of zero-emission trucks. SCAG continues to encourage and support efforts by regional partners and stakeholders to address goods movement emissions and impacts on communities.
160-13	Penny Newman	The Center for Community Action and Environmental	SCAG should use the highest polluting facilities for testing and evaluation, as well as for the use of advanced technology locomotive demonstrations.	Comment noted. Emissions from goods movement activities are a significant concern for the region. SCAG continues to work with and support efforts by regional partners and stakeholders to address goods movement emissions and impacts.

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160-14	Penny Newman	The Center for Community Action and Environmental Justice	The public health evidence is insurmountable to deny. Our built environment plays a direct impact to our health and the transportation sector must take into consideration the public health implications to the region, as well as those communities of concern and not just the region's economic growth.	Comment noted. The RTP/SCS recognizes the important role that transportation and the built environment have on public health. In addition to the public health factors measured in the Environmental Justice analysis, many strategies contained in the RTP/SCS will provide widespread benefits within the region for both public health and environmental protection. For example, better placemaking will allow people to use walking and bicycling more regularly in their daily lives, and promote the development of urban parks thus providing more opportunities for recreation and exercise. Furthermore, using research-based rates and valuations produced by the American Lung Association, the RTP/SCS results in a 24 percent reduction in total health incidences, and saves over $1.5 billion per year in total costs.
161-01	Cesar Covarrubias	The Kennedy Commission	The RTP/SCS identified High-Quality Transit Areas (HQTA) in the region as opportunity planning areas for the majority of future housing and employment growth. It is projected that by the year 2035, 51 percent of new homes and 53 percent of new employment growth will be developed in HQTA. While the HQTA encourages higher density and compact development near and around job centers and transit amenities, this type of development does not necessarily facilitate the development of affordable homes throughout the SCAG region. While there are several jurisdictions that have initiated urban infill or transit-oriented developments, many of these housing developments have been planned or developed to provide housing opportunities affordable to higher income households. These developments lack mixed-income housing opportunities that would be available to many working families, especially lower income families, who want to live and work in the City. While future growth in HQTA reflects the emerging demographic trends and is the recommended major land use scenario, the RTP/SCS acknowledges that there are potential impacts of displacement of lower income households and gentrification resulting from new transit oriented developments that attract affluent residents in the neighborhood. The Commission recommends that SCAG closely analyze, monitor and mitigate any potential impacts or environmental justice inequalities stemming from future development.	Comment noted. SCAG has shown a commitment in analyzing gentrification in the region through its Environmental Justice (EJ) Analysis. The trends observed in data from the 2000 Census and 2005-09 American Community Survey (ACS) in areas with transit oriented developments (TODs) are inconclusive. SCAG will continue to evaluate and monitor the information based on the framework presented in the EJ analysis in the future as the economy is recovering.

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161-02	Cesar Covarrubias	The Kennedy Commission	On the June 30, 2011 SCAG Environmental Workshop, participants commented on the need for a performance measure such as a jobs-housing fit analysis in the RTP/SCS. This analysis would evaluate the types of jobs being created in the community to the housing types and affordability levels of homes being developed. The RTP/SCS has instead provided a performance measure on jobs-housing imbalance or jobs-housing mismatch that analyzes the socio-economic profiles of long distance commuters. This is a small step towards the right direction but the Commission recommends there needs to be more research and thorough analysis, specifically on the jobs-housing fit, to provide a better understanding of how we can strengthen the link between jobs and housing development for all economic segments of the community.	Comment noted. Please see the jobs/housing fit and balance analysis for the inter-county commuters in the Environmental Justice Appendix (pgs. 59-61). SCAG staff used the same Longitudinal Employer-Household Dynamics (LEHD) data as SACOG/UC Davis to conduct the following analysis: (1) convert LEHD data to SCAG TAZ geographies and conduct a correlation analysis between the ratio of jobs (employment) to workers (employable residents) and the ratio of commuting distance to time; (2) define both distance and travel based buffers by modes to investigate relationships between job/worker ratio, job pay/worker earning match and commuting distance, travel time and mode usage; (3) confirm the observation and conclusion for inter-county commuters using the LEHD data. The initial result from the item #1 in the methodology described above showed that there is no correlation between job/worker ratio and commuting distance. SCAG anticipates completion of the entire analysis by summer 2012 and will share the results and policy implications with academics, MPOs and all interested parties.
161-03	Cesar Covarrubias	The Kennedy Commission	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 90.
162-01	Bart Reed	The Transit Coalition	Identify the Measure R Van Nuys and Sepulveda Pass transit projects as corridors rather than designating them as 'busways,' which could improperly preempt and prejudice the environmental clearance process. Note that neither Measure R nor Metro have chosen the mode for either corridor; “Rapidways” describe rapid transit corridors regardless of mode.	Comment noted. Text in the RTP has been revised to address the comment.
162-02	Bart Reed	The Transit Coalition	Converting existing High Occupancy Vehicle (HOV) carpool lanes to High Occupancy Toll (HOT) must allow carpools to have access to these lanes free of charge and without mandatory transponders. Otherwise, the intent of the RTP/SCS will be undermined and its outcome will underperform the potential of these lanes due to a reduction in both the number of carpools and the average number of passengers per vehicle.	Comment noted. On the existing 91 Express Lanes in Orange County, carpoolers have free access except for limited peak periods/directions. Metro has committed to keep carpools free for its forthcoming demonstration projects on I-110 and I-10. Phase 2 of SCAG's Express Travel Choices congestion pricing study will directly address implementation issues for the proposed regional HOT lane network and how existing policies could be integrated.
162-03	Bart Reed	The Transit Coalition	Converting loading and unloading activities at the ports to direct ship to rail (excluding any intermediate truck sorting steps) will enable greater capacity at lower cost and environmental impact. Creation of a freight pipeline from the Ports to the	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges

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			Inland Empire with an underground alternative to the 60 Truck Freightway should be an alternative. In addition to a regional gas tax for transportation, SCAG should implement a diesel fuel tax that accounts for both the wear and tear on roadways as well as pollution. Receipts from both taxes should be kept together in a regional transportation matching fund.	resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
163-01	Numan Parada	Transit Coalition	In looking at the RTP, it seems like a good step in the right direction in getting everyone in the same boat and how to proceed with our issues of adding people and jobs. The way I see it, we need to add houses. We need to have jobs, but we have this balancing act of doing it without consuming anymore resources than what we already have. I agree with mixed use development that is focused on resources that we already have – infrastructure that we already have. So we hope this Plan proceeds.	Comment noted.
163-02	Numan Parada	Transit Coalition	We are looking towards the very real possibility that we will have $5.00 a gallon gas by this summer and it's going to be increasing more in the foreseeable future. If this continues, it will consume more of a family's income. Because of that, short-haul flights, which consume the most fuel, may be scuttled in the future. Even if there were more flights, we obviously are going to be constrained by the airports. So we need a much better transportation system and inter-city system much like the high-speed rail program. So I want to remind everyone that we must be focused and we must keep our vision to address these issues. This document is a good first step.	Comment noted. The California High-Speed Train Phase One is in the Constrained Plan and Phase Two is in the Strategic Plan of the RTP.
164-01	Valarie McFall	Transportation Corridor Agencies	Page 23, Vision, Transportation Demand Management Transportation pricing is not identified as part of the RTP/SCS "vision" either as a transportation demand management method or as a financing tool, even though it is clearly a component of the transportation plan and financial plan for	Comment noted. Pricing is discussed as part of specific strategies such as the Express/HOT Lane Network and in the Financial Plan. The Orange County SCS is incorporated in its entirety into the SCAG RTP/SCS.

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			implementation. The Orange County SCS includes a description of the current and planned priced transportation network that should be adapted to address the entire region. Recommended Clarification: Add information from the Orange County SCS (pages 126 and 127 of the Subregional Sustainable Community Strategies Technical Appendix) that describes the existing and planned inter-operable priced transportation network in the region, including toll roads, express lanes and high occupancy toll (HOT) lanes. The text can be expanded to address HOT lanes, toll2 facilities, express lanes and tolled truck lanes in the region as a whole, and should include the following points: Tolled centerline miles in the region will increase from 61 in 2008, to 408 in 2035, including toll roads, express lanes, HOT lanes, and tolled truck lanes. Priced lanes provide flexibility and options as part of the congestion relief toolbox of measures designed to help meet sustainability and emission reduction goals related to SB 375 and other state and federal mandates. "Priced facilities are an especially important tool for providing intra-county, inter- county and interregional capacity." "The existing priced transportation network serves the locations where major employment and housing growth are projected to occur." "Toll roads and express lanes charge users a fee for travel, but typically offer less congested traffic lanes than nearby freeways and roadways. Reduced congestion provides improved and more efficient mobility with fewer air pollutants and greenhouse gas (GHG) emissions caused by congestion." "The toll road system is designed to interrelate with transit service. The toll roads can accommodate Bus Rapid Transit and express bus service, and toll road medians are sized and reserved to provide the flexibility for future transit, if appropriate." Priced facilities such as the Orange County toll roads are privately funded. This insures that these facilities can relieve congestion and associated air pollution and GHG emissions without further stressing limited state, federal and local transportation funding resources.	
164-02	Valarie McFall	Transportation Corridor Agencies	Page 42, Major Highway Completion Projects, Table 2.2 SR-241 (ORA052) is identified in Table 2.2 as a major highway completion project. However, the completion year is listed as 2020-2030. Although widening will occur in the 2020 to 2030 timeframe, the official project description identifies the	Comment noted. Table 2.2 has been revised with the correct completion year of 2030. Discussion of transportation control measures is included in the Transportation Conformity Report Appendix.

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			completion date as 2030. Recommended Clarification: In Table 2.2, we request that the completion date for SR 241 be clarified as 2030, consistent with the project description for ORA052. In the interest of establishing that some major highway projects in Table 2.2 provide emissions reduction benefits without burdening limited federal, state and local funding resources, we request the following clarifying footnote: SR 241 is a privately funded Transportation Control Measure.	
164-03	Valarie McFall	Transportation Corridor Agencies	Page 56, Express/HOT Lane Network This appears to be the only "priced transportation" discussion in the transportation investments chapter. It does not identify how many miles of priced lanes exist now, or how much that network will be expanded in the plan. Toll roads are included in the priced transportation network, along with express lanes, and HOT lanes, but are not included in the discussion. However, TCA's Toll Roads are depicted in Exhibit 2.6, Regional HOT Lane Network. The terminology should be clarified. Recommended Clarification: Re-title this section, "Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network." Table 2.6 should be retitled "Express Lanes, HOT Lanes and Toll Roads" The text should provide brief definitions of each type of facility that makes up the priced transportation network, as Express Lanes, Toll Roads and HOT Lanes each operate differently. The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities. The text should discuss that all priced facilities in the SCAG region insure inter-operability by using a common technology, FasTrak, to collect user fees. The text should discuss that all priced facilities in the SCAG region insure inter-interoperability by using a common technology, FasTrak, to collect user fees. The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ride-sharing, which is beneficial to reduced criteria pollutants and GHG emissions reductions.	Comment noted. The page referenced in the RTP/SCS identifies the proposed Express/HOT Lane Network, and is not intended to be a general discussion of priced transportation. The TCA toll roads are provided in the referenced Exhibit 2.6 as part of the background layer representing major planned highway projects, including mixed-flow and HOV projects.
164-04	Valarie McFall	Transportation Corridor Agencies	Page 76, Conservation Planning Policy The description of this policy requires clarification to express the intent of SCAG's Energy and Environment Policy Committee and the coalition of	Comment noted. A reference to OCTA's Measure M Mitigation Program will be included in the Final RTP/SCS. The conservation policy was as part of the final RTP/SCS crafted with points

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			more than 20 public, non-profit and private sector interests, including TCA that urged SCAG to include it. Recommended Clarification: Add a paragraph that explains why the conservation program benefits GHG emissions and other criteria pollutants reductions. Specifically, in addition to meeting Safe, Accountable, Flexible, Efficient Transportation Equity Act: A legacy for Users (SAFETEA-LU) requirements, the open space lands conservation program would use natural land acquisition to sequester (store) carbon, avoid GHG emissions, and reduce vehicle miles traveled (VMT). This proposed program allows for early implementation and mitigation opportunities. Jurisdictions would have the option to invest early in this open space strategy which offers immediate GHG emissions avoidance benefits, while simultaneously proceeding with the longer term and planning intensive projects to build transportation centers near existing residential areas, or employment centers near transit stations, etc. Suggested steps to develop a regional conservation planning policy should be expanded to include the following key points supported by SCAG's Energy and Environment Committee and the coalition that recommended this program: Build upon existing open space land acquisition and open space programs in the region, tailoring programs to each individual county in the region. These include, but are not limited to, OCTA's Measure M Mitigation Program, and TCA's open space mitigation program, which has protected 2,200 acres in perpetuity to date. Pursue open space conservation in a voluntary manner, working with willing private sector landowners.	identified in the comment. The air quality benefits of the conservation policy are currently described on page 78 of the final RTP/SCS. SCAG looks forward to working with the Transportation Corridor Agencies in the future.
164-05	Valarie McFall	Transportation Corridor Agencies	Page 78, Greenhouse Gases The draft document states that "The transportation sector, primarily, cars and trucks that move goods and people, is the largest contributor [to greenhouse gas (GHG) emissions] with 36.5 percent of the State's total GHG emissions in 2008. On road emissions (from passenger vehicles and heavy duty trucks) constitute 93 percent of the transportation sector total." This statement covers only part of the transportation system's GHG emissions role. The text must recognize projects that reduce transportation network GHG emissions by relieving congestion and insuring free-flow conditions. Because GHG emissions from vehicles increase in stop-and-go traffic, congestion relief projects that eliminate	Comment noted. Edits are reflected in the Transportation and Safety section of the Final RTP/SCS.

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			bottlenecks and maintain free-flow conditions actually reduce transportation network GHG emissions, much as Transportation Control Measures are transportation projects that reduce criteria pollutants. Further, the SB 375 Regional Targets Advisory Committee (RTAC) recommends tracking the performance of such strategies "to smooth extreme congestion to more carbon-friendly speeds" in its final report to the California Air Resources Board. Recommended Clarification: Insert the following statements on page 78: Congestion relief projects reduce transportation network GHG emissions, which otherwise result from idling. Consistent with the SB 375 RTAC's recommendation in its final report to the California Air Resources Board, the RTP/SCS includes projects and strategies designed "to smooth extreme congestion to more carbon-friendly speeds." A subset of projects included in the Draft RTP/SCS reduce GHG emissions by providing relief of existing and projected congestion. These include toll roads, express lanes, HOT lanes, high occupancy vehicle (HOV) lanes, and dedicated truck toll lanes. Congestion pricing is a powerful transportation demand management tool incorporated in the Draft RTP/SCS for reducing GHG emissions. SCAG has launched a two-year study of congestion pricing strategies that can provide needed transportation facilities while reducing the region's GHG emissions associated with vehicle trips. Orange County's toll road network is a prime example of priced congestion relief projects. The toll roads have variable pricing incentives that spread out vehicle use to limit peak-hour congestion that leads to increased GHG emissions. Other examples of projects that reduce GHG emissions on the regional transportation network include express lanes,	
164-06	Valarie McFall	Transportation Corridor Agencies	Page 79, Air Quality Transportation Control Measures (TCMs) are mentioned as mitigation measures, but are not defined or illustrated. The importance of TCMs needs to be clarified and expanded to clearly communicate their air quality role in the RTP. Recommended Clarification: • Provide a brief description of projects that qualify as TCMs. • Explain the role of TCMs in reducing emissions. • Provide a reference to the list of TCMs contained in the Conformity Technical Report.	Comment noted. Appropriate revisions were made in the final RTP/SCS.
164-07	Valarie McFall	Transportation Corridor	Page 86, Financial Plan, Introduction The draft document states that "We have successfully implemented toll systems in the past	Comment noted. We agree that priced transportation facilities can provide for financial innovation, especially when they can

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		Agencies	with the Transportation Corridor Agencies' network of toll roads and the SR-91 Express Lanes in Orange County. This kind of innovation in transportation continues as neighboring counties within our region consider a broader network of toll systems." However, the statement needs to clarify the financial planning importance of privately funded toll facilities. Recommended Clarification: Priced transportation facilities also provide the opportunity for financial innovation. The Orange County toll roads (SR 73, SR 133, SR 241, and SR 261) are privately funded. They provide congestion relief and associated air pollution and GHG emissions reduction without further stressing limited federal, state, and local transportation funding.	facilitate private financing to be paid back with toll revenues or other user fees/pledged source of revenues.
164-08	Valarie McFall	Transportation Corridor Agencies	Page 92, Core Revenues, Regional Revenues Table 3.6, Regional Revenues, identified federal, state and local sources of transportation funding for the plan. Nowhere in the document is the private sector funding contribution assumed for the plan described, although toll road widenings, expansions, and new tolled facilities that are privately funded are included in the plan and in the total cost of the plan. Accurately describing the extent of private funding is an important public disclosure, and an important element of the financial plan that relieves the burden on limited federal, state and local transportation funding. Recommended Clarification: • Clarify in the text the percentage of total funding contributed by private sources. This sum should include the privately funded Orange County toll roads (SR 73, SR 133, SR 241, and SR 261). • A companion pie-chart, similar to Table 3.6, showing the split between public and private funding would also clarify this point.	Comment noted. Private funding is specifically described under the private equity participation portion of the reasonably available revenue sources. While private financing is an important innovative financing tool, it should be noted that the associated debt must be paid back through tolls or some form of return on investment to facilitate private sector participants to take on investment risks. The RTP does include private funding (and not just financing), though it is a small share of the overall revenue sources.
164-09	Valarie McFall	Transportation Corridor Agencies	Page 103, Table 3.5 2012 RTP Revenues (in Nominal Dollars, Billions) Until such time that the TCA Board reviews, considers, and/or approves a VMT-based user fee; TCA is not in a position to support an increase in fees as proposed in the draft Plan. Furthermore, the draft does not clarify how the cost of a proposed new VMT fee, increased gas tax fee, tolls and user fees would layer over each other. It appears that they would accumulate for individual drivers, with a potentially significant economic impact on drivers and households. Drivers paying to use toll roads, express lanes and HOT lanes would be paying twice for the same mileage.	Comment noted. The Transportation Finance Appendix provides detailed explanations on all revenue sources included in the RTP. This report also clearly states that the mileage-based user fee and adjustments to state and federal gas excises taxes would not layer over each other. The potential implementation of the mileage-based user fee is not assumed to start until 2025. It is also assumed to replace the existing state and federal gas excise tax. We acknowledge that additional work is needed before the mileage-based user fee would become effective, which is basis for assumption that implementation begins after 2025. The inclusion of the mileage-based user fee is based on recommendations from two national commissions established

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				by Congress through SAFETEA-LU to establish sustainable transportation revenue sources. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users. The proposed mileage-based user fee, like existing state and federal gas excise taxes, is directly linked to the amount of transportation resource used. While the mileage-based user fee would charge drivers for each mile traveled, the existing gas excise taxes charge drivers for each gallon consumed. The amount of gallons of gas consumed is a direct product of the total number of miles traveled. All drivers currently using the existing TCA facilities pay tolls for use of the toll roads and the 91 Express Lanes (if they use it): they pay state and federal gas taxes (which funds TCA facilities operation and maintenance); and they pay the Measure M sales tax (if they purchase goods in Orange County). The introduction of the mileage-based user fee does not introduce a layer of costs that do not already exist. The Express Travel Choices Phase II study, included in the RTP will specifically address coordinating policies on pricing of express/HOT lanes and toll facilities throughout the SCAG region.
164-10	Valarie McFall	Transportation Corridor Agencies	Page 145, Exhibit 4.17, Land Use Pattern Orange County (2035) The southerly portion of SR 241 (ORA052), from Oso Parkway to the San Diego County border, has been inadvertently left off this map. Recommended Clarification: • Please show the SR 241 alignment on Exhibit 4.17 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS.	Comment noted. SCAG will update Exhibit 4.17.
164-11	Valarie McFall	Transportation Corridor Agencies	Page 161, Performance Outcomes This text should clearly state that performance measures and outcomes are not intended to apply to individual areas or projects, but rather to the region as a whole. Recommended Clarification: We recommend that the following clarification be inserted: Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.	Comment noted. The RTP/SCS performance measures are assessed at the regional level. Clarifying language will be added to Table 5.1 stating that these measures are not required for use at the subregional or project-specific level.
164-12	Valarie McFall	Transportation Corridor	Page 207, Strategic Plan SCAG assumes $100 billion will be available from a future VMT fee starting in 2025, but funding for	Comment noted. We agree that additional work is needed before the mileage-based user fee would become effective.

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		Agencies	mileage-based user fee demonstration projects and implementation strategies are not included in the constrained RTP/SCS; they are listed in the unfunded Strategic Plan. The TCA Board has made no decision on the use of VMT fees and until such time is unable to support its use in the proposed in the draft Plan.	That is why we did not assume it would be implemented prior to 2025. The inclusion of the mileage-based user fee is based on recommendations from two national commissions established by Congress through SAFETEA-LU to establish sustainable transportation revenue sources. In addition to efforts underway throughout the country, we will lay-out an implementation plan for the mileage-based user fee in the Transportation Finance Appendix. Included in the implementation plan will be steps to evaluate and address any disproportionate impacts to users. The mileage-based user fee demonstration projects and implementation strategies, included in the Strategic Plan, are illustrative projects that could be funded if additional resources become available.
164-13	Valarie McFall	Transportation Corridor Agencies	Highways and Arterials Technical Report Page 15, Express/ High Occupancy Toll (HOT) Lane Network. As with the comment on page 57 of the main RTP/SCS document, the technical report should clearly include toll facilities in the description of projects included in this category. Orange County toll roads are not categorized as express or HOT lanes, but collect tolls as a means of insuring low-emission free-flow capacity and funding the construction and operation of the facility. Toll roads integrate with express lane and HOT lane facilities via the common FasTrak technology that allows inter-operability and convenience for drivers. Retitle this section, "Express Lanes, HOT Lanes and Toll Roads: The Priced Transportation Network." • Table 2.6 should be retitled "Express Lanes, HOT Lanes and Toll Roads" • The text should provide brief definitions of each type of facility that makes up the priced transportation network, as express lanes, toll roads and HOT lanes each operate differently. Recommended Clarification: The text should discuss that all priced facilities in the SCAG region ensure inter-operability by using a common technology, FasTrak, to collect user fees. • The discussion should include that express lanes, HOT lanes and toll roads generate user fees that pay for construction and operation of their facilities. • The text should establish the congestion reducing goal of priced transportation, and the associated criteria pollutants and GHG emissions benefits of providing free flow capacity that avoids emissions generated by idling. In addition, user fees provide an economic incentive for cost-sharing that promotes ridesharing which is	Comment noted. This section of the report identifies the proposed Express/HOT Lane Network, and is not intended to be a general discussion of priced transportation. The TCA toll roads are provided in Exhibit 6 as part of the background layer representing major planned highway projects, including mixed-flow and HOV projects.

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			beneficial to reduced criteria and GHG emissions reductions.	
164-14	Valarie McFall	Transportation Corridor Agencies	SCS Background Documentation Pages 36 and 37, Land Use Pattern Maps for 2020 and 2035. Both of these maps are inconsistent with transportation network maps in the document and do not include SR 241 (ORA052), specifically called out in the RTP as a TCM and priced transportation project in southern Orange County. Recommended Clarification: Please show the SR 241 alignment on the Land Use Pattern Maps for 2020 and 2035 consistent with the project modeling list and other transportation network maps in the Draft RTP/SCS. Page 54, Pricing and Vehicle Policy Assumptions. This discussion only refers to a 2-cent per mile VMT fee; the Plan proposes a 5-cent per mile fee. This inconsistency should be eliminated. Recommended Clarification: • Amend the reference to a 2-cent VMT fee to a 5-cent per mile VMT fee starting in 2025, consistent with the RTP/SCS main document. Add the following sentence: • Toll roads, express lanes and HOT lanes charge varying tolls per mile for use of their facilities. Tolls are project-specific and typically vary by time of day and day of the week. Tolls collected for existing toll roads in Orange County are dedicated to operational expenses and retiring the bonds issued for construction.	Comment noted. The existing, not planned, highway network is used for reference in the Land Use Pattern Maps. Regarding Page 54, this section of the report summarizes various planning assumptions used in a sketch scenario modeling exercise to inform public workshops. It is not intended to be a general discussion of priced transportation.
164-15	Valarie McFall	Transportation Corridor Agencies	Transportation Conformity Technical Report Page 14, Toll Roads: The discussion of toll road assumptions specifically mentions express lanes and HOT lanes, but not tolled facilities such as existing toll roads SR 73, SR 241, SR 133 and SR 261 in Orange County. Recommended clarification: SR 241 should be added to Table 6 as a tolled facility and the effect of the toll charges on it should be incorporated into the highway assignment procedure. Table 6 should be retitled appropriately to include "Express Lane, HOT Lane and Toll Road Networks." This change should also be made in the main RTP/SCS document.	Comment noted. All toll roads are appropriately included in the 2012 RTP/SCS highway networks and modeled (the effect of the TCA toll charges on those toll roads was incorporated into the highway assignment Procedure), and the text will be revised to reflect the TCA toll roads are part of the existing toll road network. The intention of Table 6 is to identify the Express Lane network new to the 2012 RTP.
164-16	Valarie McFall	Transportation Corridor Agencies	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 91.
164-17	Valarie McFall	Transportation Corridor Agencies	Transportation Conformity Technical Report General This report addresses the need for the transportation system to enhance emergency preparedness, and transportation security and preparedness. Projects that enhance the region's security are	Comment noted. Most transportation projects identified in the RTP/SCS will help improve transportation safety and security in the region directly or indirectly. SCAG concurs that the redundancy provided by projects such as SR-241 could assist in

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			not identified. Recommended Clarification: Provide illustrations of transportation projects needed in the RTP/SCS to improve transportation security. For example, the southerly extension of SR 241 provides an alternative route connecting the SCAG and San Diego Association of Governments coastal regions, which have very high current and projected travel volumes. This route will ease future projected congestion to ensure critical capacity for access and evacuation in times of environmental or other emergencies, such as earthquakes, wildfires, traffic accidents, and potential nuclear threats at the San Onofre plant. The need for an alternative route was recently illustrated by the lack of evacuation capacity from the 2007 North San Diego County wildfires.	addressing mass evacuation during catastrophic events in the region. In addition, SCAG has three areas where it can assist both before a major emergency and during the recovery period: 1. Provide a policy forum to help develop regional consensus and education on security policies and emergency response. 2. Assist in the planning and programming of transportation infrastructure repairs 3. Leverage projects and planning functions (including Intelligent Transportation Systems, also known as ITS) that can enhance or provide benefit to transportation security efforts and those responsible for planning and responding to emergencies. a. Integrate security into the regional ITS architecture b. Become a central repository/mirror for regional geo-data that can be used for planning, training, response and relief efforts of law enforcement personnel and emergency responders. SCAG works with local, state and federal agencies in the planning for disaster response. As an example, SCAG collaborated with local jurisdictions, the State of California and the Federal Emergency Management Agency in the development of the Southern California Catastrophic Earthquake Response Plan. The Southern California Catastrophic Earthquake Response Plan (OPLAN) provides a coordinated state/federal response to a catastrophic earthquake in Southern California. SCAG has also assisted local jurisdictions by modeling regional impacts of transportation failures, such as an interchange collapse. SCAG regularly updates the regional ITS Architecture to incorporate security, most recently Positive Train Control. While SCAG has a role in planning for transportation infrastructure, and the repair of transportation infrastructure after a disaster, County Offices of Emergency Services and the Federal Emergency Management Agency are responsible for immediate and sustained disaster response including the identification of safe access/evacuation routes based on the nature of the emergency.
164-18	Valarie McFall	Transportation Corridor Agencies	Performance Measures Technical Report Page 2, discussion of types of performance measures. As with the comment on page 160 of the main RTP/SCS document, the text must make clear that the performance indicators are intended to be applied to	Comment noted. The Performance Measures Appendix was revised to state that the RTP/SCS performance measures are not required for use at the subregional or project-specific level.

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			the RTP/SCS at the regional level and are not proposed for project-specific application. Recommended Clarification: We recommend that the following clarification be inserted: • Performance measures and expected outcomes will be used to monitor the RTP/SCS at the regional level; these measures and outcomes are not proposed for use at the subregional or project-specific level.	
165-01	John Longville	Trustee, San Bernardino Community College District	As a past president of SCAG (1992-1993) who has been active in California transportation policy for more than 35 years, I am encouraged to see our MPO proposing to address the declining investments our State has been making in needed construction and maintenance. Decades ago California wisely spent tax dollars to build and repair the vital transportation infrastructure on which our entire economy depends. We must resume that level of investment so that our children will be able to compete effectively in the 21st century world economy.	Comment noted.
166-01	John Longville	Trustee, San Bernardino Community College District	As a past president of SCAG (1992-1993) who has been active in California transportation policy for more than 35 years, I hope that we will retain the ability in this RTP/SCS to adopt new technological solutions to our goods movement problems, as well as the currently proposed truck corridor strategy. Private sector investors are developing an alternative highly mechanized freight-moving system that has won the support of the Sierra Club for its environmental benefits and that offers some remarkable energy and time advantages as well. SCAG's final language in the RTP should be written broadly enough to avoid needlessly placing obstacles in the way of such technological progress in goods movement abilities.	Comment noted. Thank you for your past service to SCAG. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
167-01	John Longville	Trustee, San Bernardino Community College District	Our generation has benefited greatly from the transportation investments that earlier Californians made many decades ago. We have been less foresighted in recent years, declining to pay for much of the infrastructure maintenance, expansions and improvements that those who follow us will need. "Reasonably	Comment noted.

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			available revenues" should not be discounted to accommodate those who have reaped the rewards of earlier public expenditures but now do not want to pay forward a fair share for the needs of our children and grandchildren.	
168-01	John Longville	Trustee, San Bernardino Community College District	More than 20 years ago I was one of the founders of the Southern California Regional Rail Association, which created Metrolink. Unfortunately, many people are still unable to use Metrolink, either because of inadequate train frequency or because the system has too many unserved areas. Improvements to that existing system will make it useful for a larger proportion of our population, greatly increasing the overall efficiency of the region's total transportation system.	Comment noted. The Draft RTP includes $4.1 billion for capital expansion of the commuter rail system, plus additional funding for speed improvements associated with the California High Speed Rail project.
169-01	Frank Colcord	Unitarian Universalist Legislative Ministry	The UULM will be submitting detailed comments in writing that will emphasize things like active transportation. I am here today mainly to voice general support for the Draft RTP/SCS. My demonization's principals emphasize inherit worth and dignity of the individual while recognizing human kinds interconnected dependence on our environment. The RTP reflects those values by helping ensure access to transportation and housing for all those in our community in way that emphasizes environmental sustainability. The RTP fill a real need which is to ride a tangible vision for what our community can look like in this time of climate change.	Comment noted.
170-01	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	We are pleased that the draft RTP and SCS have a number of positive elements expanding clean transportation, encouraging more sustainable land uses, and reducing greenhouse gas emissions: - The planning process took account of the relationship between transportation, land use, sustainability, environmental justice and economic development. - The draft plan calls for significant investments in transit construction, operations and maintenance, -The draft plan increases investments in active transportation compared to previous RTPs. - The draft plan anticipates that vehicle miles traveled will increase less than population growth - The sustainable communities strategy quantifies how different forms of growth will have very different impacts on sprawl, energy and water use and other sustainability indicators. - The draft plan anticipates adoption of zero emission technologies towards the end of the plan time frame. - The draft plan supports high speed rail. - The draft plan anticipates a reduction in greenhouse gas	Comment noted.

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			emissions from transportation in line with the goals of SB 375. - The single largest anticipated funding source in the draft plan is implementation of a fee on driving or an increase in the gas tax, either of which would discourage driving. - Much of the new highway space proposed in the draft plan is toll roads, HOV lanes, or HOT lanes (open to HOB or Tolls) and therefore may lead to less new, induced driving than the provision of free, multiuse lanes. We however, believe that the plans can do more and need to do more to expand alternatives to driving; price car and truck traffic to reflect their negative externalities; reduce the amount of space given to cars, trucks and parking; create good places rather than sprawl; and clean up the goods movement industry.	
170-02	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	Rapidly create a more balanced transportation system. The SCAG region has 21,638 center-line miles of road, 4315 miles of bikeways of varied quality (almost zero if it protected lanes on streets), and 470 miles of passenger trains (only 80 miles of which is light rail/subway, the rest metrolink). Opportunities and infrastructure to walk, bike, and take transit should be rapidly expanded so residents have choices how far to get around. 1. Significantly increase investments in active transportation from the $6 billion budgeted. The Los Angeles County Department of Public Health calculates that $40 billion is needed to fix sidewalks, implement jurisdictions' bike plans; and invest in last mile infrastructure near transit stations. - Streets are our most important public spaces so we should reconfigure them to be vibrant, safe, healthy places rather than spaces designed to move as many cars as possible without regards for impacts on adjacent activities. Active transportation funding should convert existing arterials and local streets to be world class living and complete streets. SCAG should encourage jurisdictions to follow the street design standards contained in the Model Design Manual for Living Streets. - Most cities in the SCAG area have not developed bike or pedestrian plans so part of this funding should go towards assisting these cities in developing plans early in the implementation years. - Most people will not ride bicycle in traffic (or separated from traffic by a painted line). In the developed world, every nation with high rates of cycling has separated bike facilities while every nation with low cycling rates lacks this infrastructure. Let's start	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.

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			creating a network of protected bike lanes/cycletracks in all urbanized areas of Southern California, like the Dutch did beginning in the mid 1970's. Budget at least $1 billion for the construction of 1000-2000 miles of protected bike lines to increase rates of cycling among non traditional cyclists constructed in Long Beach.	
170-03	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	2. Expand and accelerate transit investments so all planned transit projects in the RTP are constructed by 2022. Existing and new transit services should be funded so as to be affordable with frequent service. Rapid buses should serve all major streets in urban areas so that buses become the default motorized transportation choice.	Comment noted. SCAG supports an expansion of BRT services and other transit projects with frequent and affordable service as soon as funding becomes available.
170-04	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	Pay for additional active transportation and transit investments by defunding harmful highway projects and by identifying local revenue sources that tax harmful transportation. Moving people by cars and materials by trucks and diesel trains and separating where we live from where we work and shop produces fatal collisions, cancer and heart disease, obesity and diabetes, and climate change with a disparate impact on residents of low income neighborhoods bisected by highways and living near ports, warehouses, railyards and intermodal facilitie. SCAG should projects that increase harmful transportation and tax driving and freight transport to pay for clean transportation. 1. Chancel highway expansion projects to pay for more active transportation and transit. Among the dozen most expensive road expansion projects in the RTP are: east west freight corridor ($15.2 billion), Riverside to Orange County CETAP ($13 billion), high desert corridor ($6.9 billion), 710 corridor expansion ($6.1 billion), 710 gap closure ($5.6 billion), 5 north capacity enhancements ($5.3 billion), 241 expansion ($2.7 billion), mid county parkway ($2.3 billion), 15 widening ($1.7 billion), 405 widening in Orange County ($1.7 billion), 5 widening ($1.6 billion), and 79 expansion ($1.4 billion). Building these highways projects will expand driving (and, if built in areas with predominately rural or suburban land uses, also expand sprawl). Cancelling them can allow the $63.5 billion budgeted for these projects to be spent on active transportation and transit.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenue sources, and other previous commitments.
170-05	Mark Vallianatos	Urban and Environmental	2. Support local revenue sources that price driving, parking, and freight transport to reflect the externalities of motorized	Comment noted. As noted, the Financial Plan includes a variety of revenue sources tied to transportation users. One of the key

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		Policy Institute Occidental College	transportation. There are a variety of methods for increasing the price of driving, some of which are contemplated in the RTP's financial plan.Higher gas taxes, carbon taxes, charges based on miles driven, appropriately and dynamically priced parking, and congestion charges aimed at commuters entering central city areas are all useful policies.	principles SCAG considered as a foundation for identifying regionally appropriate revenues that are reasonably available in developing the RTP financial strategies is to establish a user-based system that better reflects the true cost of transportation, provides firewall protection for transportation funds, and ensures an equitable distribution of costs and benefits.
170-06	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	C. Reduce rather than increase the space granted to cars and trucks in order to reduce driving. Roads and parking currently take up too much of our land, which encourages car-based transportation and all the problems that accompany it. Driving increases when roads are constructed, lengthened or widened. 1. Do not add any lane miles of highways or major arterials. The SCAG region currently (base year 2008) has 21,638 miles of road and 55,890 lane miles of roads. the draft RTP anticipates adding 948 centerline miles/ 7419 lanes miles which would be a 4.4% 11.1% increase. As Duranton and Turner have shown, "For interstate highways in the densest metropolitan areas we find that vkt increase in exact proportion to highways, confining the 'fundamental law of highway congestion' suggested by Downs (1962, 1992). This relationship also approximately holds for other important roads in dense areas and for interstate highways in less dense part of metropolitan areas." Converting mixed flow lanes to toll, HOV or HOT lanes or converting HOV lanes to toll or HOT lanes would still be acceptable.	Comment noted.
170-07	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	2. Set a target to reduce vehicle miles traveled from the baseline year of 2008. Vehicle Miles traveled in the baseline year 2008 was 445,844 daily, approximately half of freeways, half of arterial roads. SCAG calculates that this number will rise to 546,806 daily by 2035 without any changes to roads (a 22.6% increase). Under their plan, VMT will still rise, to 516,990 (16% increase). They also anticipate that VMT for trucks will grow even faster, expanding from 30,201 to 53,431 under their 2035 plan (a 76.9% increase). Instead of planning for this increase, set a target for a reduction in VMT.	Comment noted. SCAG may consider VMT reduction targets in future RTPs.
170-08	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	3. Plan for highway removal or modification. Learning from cities removing highways, agencies and municipalities should plan to remove, cover or alter and reclassify as arterials highways that divide communities, negatively impact valuable natural resources such as rivers and coasts, or channel excessive	Comment noted. Plans for highway removal or modification should also consider circulation impacts to surrounding areas and the regional system.

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			valuable traffic into neighborhoods. Freeway stubs such as the 710 N above the 10 or the 2 as it approaches Silverlake are ripe for removal or conversion and the 101 through downtown Los Angeles has been the subject of advocacy for capping for a park.	
170-09	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	D. Pursue stronger sustainable communities strategies to create good places rather than sprawl. People are drawn to diversity in the built environment, so municipalities should increase interesting, mixed-use neighborhoods by focusing growth near transit and altering zoning rules that restrict mixed use development to a small fraction of cities' land area. 1. Adopt alternative 3 (the envision 2 alternative) smart growth land use and housing patterns) rather than the planned project. This alternative version of the plan relies on smart growth land use and housing patterns to achieve superior environmental results in air quality, aesthetics, open space and farmland preservation, water conservation, greenhouse gas emissions reductions, mobility, and land use.	Comment noted. For more information on alternatives, please see the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 54.
170-10	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	Fund local jurisdictions to allow them to update their general plans and zoning codes to reflect sustainable community and smart growth principals.	Comment noted. Through the Compass Blueprint Program, SCAG has worked with and provided direct technical assistance to 94 separate jurisdictions including local cities, counties, non-profits, and transportation agencies. Future calls for applications will focus on local implementation of SCS strategies, and will prioritize projects located in High Quality Transit Areas (HQTA). In addition, other local and regional funding agencies have begun to incorporate Compass Blueprint principles into their discretionary funding programs. SCAG will continue to pursue dedicated and discretionary funding for this important program.
170-11	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	Encourage sensitive densification of existing single family zoned areas by encouraging municipalities to allow cottage housing, duplexes, accessory dwellings, and small lot subdivisions in R-1 zones.	Comment noted. Chapter 4 of the 2012 RTP/SCS includes multiple actions and strategies that address the future development of housing. These actions and strategies address the unique housing needs of local jurisdictions within the region.
170-12	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	4. Encourage all jurisdictions to eliminate mandatory parking minimums for existing and new buildings.	Comment noted. In the Transportation Demand Management Appendix, SCAG encourages cities to reconsider minimum parking requirements in zoning ordinances.
170-13	Mark Vallianatos	Urban and Environmental	E. Clean up goods movement industry before planning to expand it. Do not invest in goods movement roads and rail	Comment noted. Goods movement activities serve as a major economic driver for the SCAG region providing jobs and

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		Policy Institute Occidental College	expansion in the hopes that zero emission technologies will emerge decades later. Invest more in zero emission trucks and locomotives now as a recondition before expanding freight infrastructure. Otherwise impacted communities will continue to suffer disproportionately from pollution from good movement. 1. Require widespread adoption of zero emission trucks and rail in the region as a precondition for funding any expansion of goods movement infrastructure.	revenues for Southern California residents and businesses. Forecasts indicate that the amount of goods moving through the region are expected to increase significantly over the RTP horizon. SCAG works closely with regional partners and stakeholders to identify appropriate solutions to freight challenges that may include expansion of regional facilities used for goods movement activities. However, emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero-emission trucks. This system also offers the opportunity to incentivize the adoption of clean, zero-emission technologies for regional freight movement. The 2012 RTP offers a plan to maintain the economic benefits of freight movement while addressing the myriad impacts of freight. The two are linked and cannot be approached as separate concerns. SCAG continues to work with, and support the efforts of, regional partners and stakeholders to address goods movement emissions and impacts on communities.
170-14	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	Recommend a $30 per twenty-foot container fee for moving either into or out of the ports to help pay for mitigation of existing environmental impacts and to help pay for research into zero emission alternatives. This strategy could generate as much as $441 million in revenue from loaded containers in its first full year of implementation, when applied equally to imports and exports.	Comment noted. SCAG will work closely with regional partners and stakeholders to identify potential funding mechanisms as appropriate.
170-15	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	3. Require maximum development of on dock rail before funding any off dock projects.	Comment noted. SCAG works closely with partner agencies, including the San Pedro Bay Ports, to identify and support implementation of regionally-beneficial projects as appropriate. However, SCAG does not determine the sequencing of the implementation of projects at the San Pedro Bay Ports.
170-16	Mark Vallianatos	Urban and Environmental Policy Institute Occidental College	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 54.
171-01	Stuart Waldman	Valley Industry and Commerce Association	On behalf of the Valley Industry and Commerce Association (VICA), thank you for your commitment to the transportation needs of Southern California. While we appreciate the inclusion of a handful of major San Fernando Valley-centered projects in	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation

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			the Regional Transportation Plan (RTP), we are disappointed by the insufficient appropriations for these projects and the lack of investment overall in the San Fernando Valley.	plans, and other previous commitments.
171-02	Stuart Waldman	Valley Industry and Commerce Association	Specifically, no funding is directed to renovations of I-101 between downtown Los Angeles and the city of Calabasas or improvements to I-405 north of the I-101 interchange.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenue sources, and other previous commitments
171-03	Stuart Waldman	Valley Industry and Commerce Association	Furthermore, I-134, I-170, and the major arterials of the Valley receive minimal investment.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenue sources, and other previous commitments.
171-04	Stuart Waldman	Valley Industry and Commerce Association	Despite $40 billion in financing secured for Measure R projects in the greater San Fernando Valley, the only Valley projects in the Federal Transportation Improvement Plan (FTIP) are the renovation of the Interstate-101 off-ramp at Van Nuys Boulevard; the freeway connector at the I-101 and I-405 interchange; the I-405 Corridor Mass Transit project through the Sepulveda Pass; the studies of the Van Nuys corridor and Burbank-Glendale-Pasadena Airport intermodal ground access; and expansion of transit centers at Pierce and Mission Colleges. These projects are of vital regional significance to the Valley, but they are only the tip of the iceberg.	Comment noted. The distribution of funding for different transportation investments in the RTP reflects local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenue sources, and other previous commitments.
171-05	Stuart Waldman	Valley Industry and Commerce Association	Key sections of the I-101 freeway need to be renovated to relieve bottlenecks and increase roadway safety between the Valley and downtown Los Angeles. These sections include the I-101 interchanges with the I-170 and I-134, which connect commuters and clients with the north, east and west San Fernando Valley. The roadway degradation along this I-101 corridor requires immediate attention and should be included in the RTP.	Comment noted. The RTP includes $56.7 billion through 2035 for highway system preservation.
171-06	Stuart Waldman	Valley Industry and Commerce Association	The north and west Valley also depend heavily on I-405.	Comment noted.
171-07	Stuart	Valley Industry	To reduce traffic and enable quicker, more efficient	Comment noted. The RTP includes an array of new transit

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	Waldman	and Commerce Association	transportation between the Valley and West Los Angeles, mass transit solutions are necessary.	capital investments.
171-08	Stuart Waldman	Valley Industry and Commerce Association	The I-405 Mass Transit project through the Sepulveda Pass is the first step.	Comment noted. This is a Measure R project included in the RTP.
171-09	Stuart Waldman	Valley Industry and Commerce Association	A planning process and full financing must be put into place without delay.	Comment noted.
171-10	Stuart Waldman	Valley Industry and Commerce Association	While renovation of I-101 and I-405 are pressing, their effective use will not be possible without proper maintenance of the transportation system that serves these freeways	Comment noted. The RTP includes $56.7 billion through 2035 for highway system preservation.
171-11	Stuart Waldman	Valley Industry and Commerce Association	While the Financially-Constrained RTP Projects and Strategic Plan lists contain a few projects along major Valley arterials, this system requires immediate restoration and improvement. Van Nuys Boulevard, Sepulveda Boulevard, Riverside Boulevard, Ventura Boulevard, Mulholland Drive, Laurel Canyon Boulevard, Victory Boulevard, Sherman Way, Burbank Boulevard, Reseda Boulevard, Topanga Canyon Boulevard, De Soto Avenue, Vineland Boulevard, Hollywood Way, Canoga Avenue, Vanowen Street, Nordhoff Street and Lankershim Boulevard are just a few of the several roadways critical for employees and clients to access the Valley using I-101 and I-405.	Comment noted. The RTP includes $20.9 billion through 2035 for local streets and roads system preservation.
171-12	Stuart Waldman	Valley Industry and Commerce Association	The City of Los Angeles recently submitted a list of additional "Local Highway" projects, the majority of which target major Valley arterials. We ask that you review this list and include several—if not all—of the identified projects in the Strategic Plan.	Comment noted.
171-13	Stuart Waldman	Valley Industry and Commerce Association	The sections of I-170, I-134 and I-5 freeways connecting the east San Fernando Valley cities of Burbank and Glendale to the rest of Los Angeles County also receive only minor attention in the RTP.	Comment noted.
171-14	Stuart Waldman	Valley Industry and Commerce Association	Roadway repair and mass transit options along these routes are necessary for Bob Hope Airport access and mobility into and within these east Valley cities. We ask that you increase investment in the Burbank-Glendale-Pasadena Airport	Comment noted. Some of these ground-access projects are included in the Strategic Plan. SCAG will continue working with Bob Hope Airport, City of Los Angeles and LA Metro to further explore opportunities to consider these projects in future RTP

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			intermodal ground access study and add renovations of the East Valley arterials to the Strategic Plan.	updates.
171-15	Stuart Waldman	Valley Industry and Commerce Association	Thank you for considering our recommendations. We look forward to full funding of the San Fernando Valley projects on the Federal Transportation Investment Plan and Financially-Constrained RTP Projects lists, as well as expansion of the Strategic Plan to include critical Valley projects.	Comment noted.
172-01	Rachel Morris	VCCool + Ventura Bicycle Union	You will find our 1,241 signatures for increased funding for Active Transportation in the 2012 SCAG RTP in the shared Dropbox folder as noted in my e-mail. To see VCCool's online petition and video please visit: www.active-transit.org.	Comment noted.
173-01	Ben Cacatian	Ventura County Air Pollution Control District	Pg. 26 The 2007 ozone AQMP was approved by VCAPCD and ARB and submitted to US EPA as the Ventura County portion of the SIP in 2008. EPA has not formally approved the 2007 SIP submittal, thus, the 1994/1995 approved SIP is the applicable SIP for conformity. The 2007 submitted SIP does not include TCM G – Employee Commute Options (ECO) that was part of the 1994/1995 approved SIP. TCM G was repealed in 1998 as result of the federal removal of the ECO mandate and State law that prohibited non-mandated federal ECO rules. Pg. 27 You have listed the "Land Use Strategy Transit Strategies" as one TCM. These two strategies are separate TCMs and should be shown separately on the list.	Comment noted. Appropriate revisions has been reflected in the Final RTP.
173-02	Ben Cacatian	Ventura County Air Pollution Control District	PROJECT LIST APPENDIX The project list should include the name of the lead agency/jurisdiction to cross reference the projects with other sections of the RTP/RTIP and locate the project descriptions from the agencies/jurisdictions. The listed project costs for Ventura County appear to be extremely large and appear to need updates. The following Ventura County projects, as listed by their respective description and completion date, appear to be TCMs and should be listed Transportation Conformity Report appendix: VEN055410, VEN055413, VEN031203, 5TC0701, VEN990310, VEN990319, VEN053403, VEN051401, VEN031229, VEN040502, 5TPL04, VEN056403, VEN990341, 5N011, 5A0742, 7120009, 7120008.	Comment noted. SCAG attempted to collect lead agency information for all RTP projects but was not able to collect this for all projects. In response to the TCM comment: VEN055410, VEN055413, VEN031203, VEN990310, VEN051401, and VEN031229 have been corrected to be non-reportable TCMs; VEN990319 has been corrected to be not a TCM; VEN990341 is not a reportable TCM; 5TPL04, 5N011, 5A0742, 5TC0701, 7120009, and 7120008 are not committed TCMs and thus are not included in the Transportation Conformity Report; Appropriate revisions will be incorporated into final RTP regarding VEN040502, VEN053403, and VEN056403.
174-01	Rachel Morris	Ventura County Climate Care Options Organized	5-8% of 2012 RTP /SCS total investment of should go to active transportation. Petition with 1241 signatures.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active

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		Locally		Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
175-01	Patty Senecal	Western States Petroleum Association	The RTP/SCS should consider a range of possible growth factors for the goods movement sector (e.g., high, low). This "bounding exercise" would help decision makers and the public better understand how sensitive economic and environmental factors are to goods movement sector growth. Also, given that we are informed that ship emissions are temporally variable, the "bounding exercise" should also inform the AQMP emissions inventory and consequent air quality modeling. It is especially important that SCAG validate the emissions baseline (e.g., the 2009-2011 actual emissions) so that the growth projections are based on "real" emissions rather than theoretical or modeled emissions from past exercises. This is made even more important because the initial "in-year" emissions are the basis for building future-year emission projections.	Comment noted. SCAG did use historical data and actual data for the base year to validate the growth trends and projected growth in the future. As such future emissions are the reflection of both base year and projection year conditions.
175-02	Patty Senecal	Western States Petroleum Association	SCAG should publish the technical assumptions used in the draft RTP/SCS concerning assumed rates of deployment for: (a) zero emission transport for container drayage; (b) zero and near zero-emission trucks for regional transport; (c) electrified rail technologies; and (d) zero or near zero emission rail technology. The timing for these assumptions is critical to the AQMP attainment demonstration. In addition, the RTP should provide information on daily, monthly, or seasonal activity associated with these actions. Again, as stated previously, this information is critical to input into the emissions inventory and the air quality modeling.	Comment noted.
175-03	Patty Senecal	Western States Petroleum Association	The RTP/SCS needs to fully consider the electricity sector infrastructure needs, implementation challenges and emissions impacts that would result from the policy recommendations contained in the draft plan. These emission impacts will be significant in scale and may impact the feasibility of RTP/SCS measures, particularly the schedules. These data are essential to	Comment noted. The Program Environmental Impact Report includes an analysis of electricity demands in the Public Services and Utilities chapter. SCAG coordinates closely with the SCAQMD in the development of the AQMP and will ensure they have the necessary data.

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			proper development of the AQMP and the air quality modeling used by the SCAQMD.	
176-01	Glenn Parker	Wildlife Corridor Conservation Authority	We are pleased to see the inclusion of an advanced mitigation component. We have suggestions for modification of the Conservation Policy: (1) Ensuring State conservancies and joint powers authorities with a conservation focus are included in the mapping & prioritization of conservation lands. Specifically, we recommend including WCCA, Puente Hills Habitat Preservation Authority, San Gabriel & Lower Los Angeles Rivers and Mountains Conservancy, Mountains Recreation and Conservation Authority, and Santa Monica Mountains Conservancy among the entities upon whose expertise can be tapped; (2) Extending the inventory of protected lands to include all protected lands-Federal, State, regional and local natural lands-instead of narrowly limiting the inventory to simply Natural Communities Conservation Plan and Habitat Conservation Plan areas; (3) Ensuring existing wildlife corridors and habitat linkages and highway/roadway undercrossings are protected and enhanced during the evaluation of habitat lands and during construction of roadway projects; (4) Advocating that the advanced mitigation policy result in a net environmental benefit for the natural resource lands after construction activities are completed. Also, large-scale acquisition and management of lands must not be limited to "critical habitat," (p. 76, 128) as this can be confused with the legal term used by US Fish & Wildlife Service for some federally endangered and threatened species. To clarify, this should be replaced by text reflecting the intent, i.e., the best available natural lands with valuable environmental resources deserving of conservation/preservation. WCCA looks forward to working with 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. WCCA recognizes conservation easements as a powerful preservation tool for habitat areas. Conservation easements, and fee title transfers to open space park agencies, should be listed in the plan alongside other preservation mechanisms. SCAG should take a leadership role in setting guidelines and best practices for these new county and municipal programs as well as explore the creation of a	Comment noted. The proposed conservation strategy will pursue a strategic planning process for identifying open space resources. The intent is to include input from a wide variety of stakeholders, including the groups listed. Referenced language regarding “critical habitat” will be changed to “important habitat lands.”

ID	Name	Affiliation	Comment	Response
			regionally unified transfer of development rights (TDR) program. This method should not only be limited to agricultural lands but also include other opens space lands.	
176-02	Glenn Parker	Wildlife Corridor Conservation Authority	The policy decisions in the SCS are projected to save 408 sq. miles of nonurban land over the life of the plan. There is no projection of where this growth will not occur and what mechanisms will preserve the land in perpetuity. The lack of specificity makes it difficult for WCCA to evaluate the impacts of the proposed plan. SCAG is clearly making assumptions about where development on resource lands is and is not appropriate. This process is not transparent. For example, the large undeveloped privately-owned property known as the Aera property in the middle of the Puente chino Hills wildlife corridor has been identified on Exhibit 4.1 as population growth of 2,001-3,500 persons per sq. mile. In fact, much of this property has been identified as a proposed Significant Ecological Area in LA County's most recent draft General Plan. Ironically, this particular development proposal's population, employment and housing growth areas contradict the goals of SB375 and its requirement for reduced VMT. The location of development is nowhere near public transit, does not include a major employment center but instead focuses on large single family residential units, requires dependency on the automobile, and will increase VMTs, not reduce them. With the understanding that land use authority belongs to local jurisdictions, a truly comprehensive regional plan would transparently set growth parameters in concert with resource conservation goals to eliminate these apparent contradictions. Projecting growth in resource areas sets in motion policies that induce that growth; therefore great care must be taken to ensure such growth meets regional objectives.	Comment noted. It is the intent of the RTP/SCS to avoid significant ecological areas. SCAG utilizes the following advisory land use policy as a foundation for the overall regional land use development pattern: ensure access to open space and habitat preservation despite competing quality-of-life demands driven by growth, housing and employment needs, and traditional development patterns.The RTP/SCS also considers areas that are to be protected from development, as required by Government Code Section 65080(b)(2)(B)(v). Furthermore, the conservation strategy will pursue a strategic planning process for identifying open space resources building off of the local plans. The intent is to include appropriate protected areas, based on input from a wide variety of stakeholders. The Exhibits 4.1, 4.2 and 4.3 were developed to fit the paper size, but the high resolution GIS map in an electronic format is available upon request. The resource maps have been developed for the purpose of illustration only. The growth figures allocated to the area were based on information received from projects submitted to SCAG through Inter-governmental Review (IGR). SCAG will work with local jurisdictions going forward on small area growth distributions to ensure that the identified Area property is correctly represented.
176-03	Glenn Parker	Wildlife Corridor Conservation Authority	WCCA appreciates SCAG's recognition of the impact that linear transportation facilities have on natural areas and the need for well-designed wildlife crossings to partially mitigate these effects. Wildlife crossings need to be discussed in the context of habitat connectivity, which is the broader ecological goal for conservation areas. 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	Comment noted. The mitigation program for Biological Resources and Open Space includes the improvement/retention of habitat linkages, preservation of wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. SCAG will consider wildlife crossings and habitat connectivity research as we develop the proposed conservation strategy. SCAG looks forward to working with the Wildlife Corridor Conservation Authority on future planning efforts.

ID	Name	Affiliation	Comment	Response
			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.	
176-04	Glenn Parker	Wildlife Corridor Conservation Authority	WCCA is interested in urban river projects for their multiple recreational, environmental, and transportation benefits. The RTP/SCS should fully fund build-out of these active transportation corridors throughout the region. When well designed, these facilities serve as "bicycle freeways" connecting various parts of the region with uninterrupted travel for non-motorized users. The RTP/SCS calls for $6 billion over the next two decades for active transportation investments, which seems low when compared to the identified need in local bike and pedestrian plans. Given the central role active transportation plays in meeting regional planning objectives, funding levels should be set based on full build-out of local bicycle and pedestrian plans, with an appropriate amount projected for those jurisdictions that have not yet completed such plans. The currently proposed funding level does not appear to be rooted in such a need-based assessment. It is not adequate to simply compare the proposed expenditures with past levels independent of a needs assessment. In addition to the total funding level, the proposed timing of active transportation investment is inadequate. Only 20% of the proposed expenditures would occur during the first 15 years of the 25-year planning period, leaving the vast majority of expenditures for the highly speculative future and of little use to current residents. Transit and transportation demand management are similarly back-loaded with only highway-related investments receiving funding priority in the near term. These non-highway investments are the ones most likely to generate greenhouse gas emissions savings, among other benefits, and the earlier they are made the longer the benefits can accumulate. The proposed expenditure plan runs directly counter to the stated emphasis of the SCS. WCCA suggests that the plan's funding priorities be reversed to immediately fund active transportation investments at a sufficient level to achieve build-out of the region's bicycle and pedestrian networks in the	Comment noted. SCAG has developed the SCAG Regional Bikeway Network to close regional gaps in the existing bicycle network. Implementation of the 2,012.2 mile network and the locally proposed bikeway projects would increase access to bikeways from 42.6% to 63.7%. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern.

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			near and medium term. Such a change would make the RTP more consistent with the land use and mode share objectives outlined by the SCS, the intent of SB375.	
176-05	Glenn Parker	Wildlife Corridor Conservation Authority	WCCA encourages SCAG to evaluate the feasibility and to develop a greenway corridor that can be used for active transportation (e.g., bicycle trail) along San Jose Creek, connecting to the San Gabriel River (by Whittier Narrows) and further west. This San Jose Creek bikeway is an east-west route that parallels the SR-60 freeway. It is an important commuter route, where a viable bikeway could relieve some freeway traffic. Maintaining and enhancing an open creek channel for wildlife use (e.g., birds) and recreational use (bicycles) would be a valuable amenity in this area. It would be beneficial to investigate and implement other bicycle routes in the area, including a connection between the LARIO trail along the Rio Hondo from its end at Peck Road Water Conservation Park to the San Gabriel River. Another valuable connection would be between the Whittier Greenway Trail to the San Gabriel River at its west end and from its east end to Coyote Creek. These trails are pieces in the larger planned bikeway trail network throughout the region.	Comment noted. SCAG will work with local jurisdictions to consider the incorporation of a greenway corridor for active transportation along the specified route as part of a future update of the SCAG Regional Bikeway Network.
176-06	Glenn Parker	Wildlife Corridor Conservation Authority	[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 94.
177-01	Steve Twining	WRAC	I am very happy to see that there is some funding for the initial phase of the Fast Train. We need to compete with Europe, Japan, and China.	Comment noted.
177-02	Steve Twining	WRAC	I have concern over the RTP's population projections and understand that you can adjust them every four years.	Comment noted. The RTP, including its population growth projections are updated every four years pursuant to federal planning requirements.
177-03	Steve Twining	WRAC	HOV Lane construction can be very disruptive to communities. Those of us on the Westside are literally almost dying in the traffic between Westwood and Brentwood. As for the Ports, your projections about containers, I am sure you are well aware about the Panama Canal being widened so larger ships can go through. As a result, perhaps the region will have a less of increase in usage at the two Ports in Long Beach and Los Angeles.	Comment noted. Mitigation of construction impacts are addressed in the project-level EIR/EIS and carried out by the implementing agencies.

ID	Name	Affiliation	Comment	Response
177-04	Steve Twining	WRAC	As for the Ports, your projections about containers, I am sure you are well aware about the Panama Canal being widened so larger ships can go through. As a result, perhaps the region will have a less of increase in usage at the two Ports in Long Beach and Los Angeles.	Comment noted. The expansion of the Panama Canal provides the potential for diversion of international cargo from the San Pedro Bay Ports. This diversion could have impacts for the regional goods movement system and its various components. However, the potential level of cargo diversion is unknown at this time. SCAG continues to work with its partners and regional stakeholders to address the concerns regarding cargo diversion as a result of the project.
177-05	Steve Twining	WRAC	Over the years the inner city transportation planning has been very weak. Recently the situation has improved somewhat. We are concerned about some of our streets which are not going to have over passes. The Expo Line is designed to reduce traffic but on some of our street traffic will be slowed because of the delay in getting over the Expo Line.	Comment noted.
177-06	Steve Twining	WRAC	The jobs housing issue is a major issue for the Westside of Los Angeles. Some of our neighboring cities have expanded their job locations at the expense of housing. Our communities suffer from all the traffic that goes to work in adjacent cities in both directions. In many of the areas of the city, in the hills particularly, we are concerned that senior citizens can not being riding bicycles downhill to connect to the east west transportation.	Comment noted. SCAG's Active Transportation Appendix and Transportation Safety Appendix have both infrastructure and safety policy recommendations that can assist in increasing safety of bicyclists. Additionally, the 2012-2035 RTP/SCS strives to expand travel options for all users of our transportation system by promoting a balanced multimodal investment approach.
177-07	Steve Twining	WRAC	The other issues that concerns me is the lack of availability to go on rapid transit directly into the airport.	Comment noted. The Airport Ground Access Report in the Aviation Technical Appendices of the Draft 2012 RTP/SCS contains an extensive analysis and discussion of public transit issues and opportunities at air carrier airports in the region, and proposes a number of new transit-related airport ground access projects.
178-01	A.K. Bahl	Camarillo resident	There must be a vote of the whole population of Camarillo – NOT 84 people shoving it down our throats!! Everyone at our meeting was AGAINST this planning. If you got 1 million negative comments and 10 positive you still wouldn't stop it, would you?!!!!	Comment noted. The Regional Transportation Plan is revised every four years to comply with Federal and State law. The proposed policies and strategies incorporated in the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy were developed by staff with input from the cities throughout the region, input from numerous workshops during the last two years, and input from SCAG's 84-member Regional Council, which is comprised of duly elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. These elected officials meet monthly as members of SCAG's Regional Council and Policy Committees, and they have discussed the proposed policies and strategies at

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				regular and special meetings and will consider the Final Plan for adoption at their April 4, 2012 meeting.
179-01	David Reid	Colton Resident	San Bernardino RTP Public Hearing - 1/18/2012 David Reid - Colton Please finish Santa Ana [River?] Bike Trail	Comment noted.
180-01	Susan Lien Longville	Concerned Citizen	As a former SCAG Regional Council Member that served during the time I was a member of the San Bernardino City Council from 1998-2006, I had the opportunity to work closely with previous Regional Transportation Plan (RTP) implementation efforts. I continue to remain engaged as a private citizen in issues of importance to Southern California. Thank you for the opportunity to submit my public comment by email. In the last RTP, there was a concept similar to the current GRID (Green Rail Intelligent Development) to which there was no progress during implementation. I am writing to express my desire that this Southern California alternative to Goods Movement be once again included in the current RTP. The GRID alternative, which proposes the installation of 15-ft. water-tight pipelines housed in an unmanned electrified rail guide way, has a number of advantages for traversing goods from the Ports of Los Angeles and Long Beach to the inland regions of California. First, installation of an underground pipeline would employ installation that is identical to the installation of water pipelines that use only a “cut and cover” technique which environmentally presents much less adverse impacts. Furthermore, this project holds the potential of creating many jobs in Southern California during the manufacturing and construction of the system because materials proposed in GRID are already manufactured locally. Finally, I believe that including an alternative Goods Movement concept that would be powered by electricity, rather than diesel, is good public policy. As a resident of San Bernardino, the concept of moving Port freight through an underground pipeline that would ultimately emerge at an Inland Port holds the promise of someday reducing the truck traffic that is affecting so many of Southern California’s Disadvantaged Communities where rail and existing roadways traverse and gravely impact the respiratory health of our children and seniors who have been shown to be disproportionately affected by goods movement. For those reasons, I urge SCAG to include the GRID alternative in the current RTP providing the opportunity to further examine a	Comment noted. Thank you for your past service to SCAG. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to identify potential solutions to regional freight challenges.

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			concept without any significant impact to air quality as is found in existing rail shipments or container movement by diesel-powered semi trucks. Sincerely, Susan Lien Lon I look forward to hearing the Regional Council has included GRID as an alternative Goods Movement Alternative. Susan Lien Longville, 1833 Kenwood Ave. 92404	
181-01	Kevin	Orange County business owner	We don't have money. We are being told that Washington is mandating this and that and they are insane. Sacramento is mandating this and that and they are insane. We don't have the money. Our money is not worth the money it's printed on. We have to be fiscally conservative and responsible. We can't afford this, as pretty as it may look.	Comment noted.
182-01	Alice Eaton	Thousand Oaks resident	I am opposed to incurring any debt on any transportation plan in this current economic climate. I feel that any plan that envisions rezoning for government to control our community's growth in this central plan is a violation of the 14th Amendment.	Comment noted.
182-02	Ernest Wurschum	Thousand Oaks resident	There should be a public meeting during the evening so that working people can attend.	Comment noted. While SCAG provides many opportunities for the public to learn about and comment on its various programs, plans, services and initiatives, including holding workshops and public hearings in various locations throughout the region at various times, SCAG realizes that not all times and locations will be convenient for everyone. SCAG will consider holding more public meetings in the evenings as part of its post-RTP/SCS assessment of outreach activities.
182-03	Michelle Gregory	Thousand Oaks resident	This is ICLEI, Agenda 21. This is NOT what people want. Ten states have passed resolutions exposing Agenda 21, ICLEI and the fraudulent "green agenda".	Comment noted. The greenhouse gas emission reduction targets that SCAG is required to meet via the 2012-2035 RTP/SCS is a state law requirement as a result of Senate Bill 375.
183-01	A Ball		We don't need more gov't interference in our cities and local plans. We don't want to live in the super density skyscraper cities that have been imposed in Korea and that you are trying to shove down our throats. If the gov't won't live there, we shouldn't have to either!!!!!	Comment noted.
183-02	A Ball		Air quality is much improved in the last ten years. We don't need gov't interference in imposing more cripling gov't legislation and mandates already inhibiting any US growth. Let free enterprise work to improve our transportation. It is always preferrable to any gov't rules!	Comment noted.
184-01	A Ball		I oppose the Regional Transportation plan! When are you going	Comment noted.

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			to publish the content of the letters directed against and for this plan? We need to have a vote from the public. We don't need increased rail and bike lanes. They are too underutilized now. We don't need more traffic lanes....just fix the ones that are there. If the border laws were enforced we wouldn't have so many people (illegal) reaching our state.	
185-01	A Ball		I oppose the regional transportation plan. This is supposed to be a 'free' country where we have a right to decide our future. Your plan takes this away from our decision and puts it in the hands of 84 people. I can't believe you, as an American, can go along with this intrusion into our lives.	Comment noted. SCAG's Regional Council and Policy Committee Members are voter-elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. The cities and counties designate the respective elected official to represent them at SCAG's Regional Council and Policy Committees.
186-01	Anna Rahtz		My comments regarding the draft RTP/SCS encompass two main concerns. 1. Why are highway capital project funds being front loaded (i.e., more or the same amount of money is being spent on them in the short term as in the long term) while funds for transit and active transportation are being back loaded (more is being spent on them in the long term after the year 2020)? 2. The text in the draft document does not seem to match up with the list of projects that are actually being funded. Much of the text in the RTP/SCS document is dedicated to explaining the need to preserve the existing system because it will cost more to reconstruct it later than to preserve it now. This is true ...so then why is a higher percentage of funding for arterial and mixed flow capital projects being spent before 2020 than for highway operations and maintenance (Table 3.6)? I counted at least 82 road widening projects just in San Bernardino County in the FTIP (which will be funded in a five year period). I would like to see more justification in the text explaining the benefits and need for these road widening projects, but when I look in the text in the draft document explaining project approach, I don't see much at all about highway capacity expansion. It seems to be bundled in with project categories such as "Mixed Flow and Interchange Improvements" and "System Completion and Expansion" that are not giving a true description of what these projects are really accomplishing. It appears to me that these capacity expansion projects are being sold as measures to relieve congestion and reduce travel times, recovering productive time for travelers. On the contrary, it has been widely proven that	Comment noted. The distribution of funding for different transportation investments in the RTP is a result of local option sales tax measure commitments approved by voters, county transportation commission adopted long-range transportation plans, limitations associated with specific revenues sources, and other previous commitments.

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			highway capacity improvement projects provide only temporary congestion relief, if any at all, and that they in fact induce additional trips that result in even heavier congestion in the long term (References: Mark Hansen and Yuanlin Huang, "Road Supply and Traffic in Californian Urban Areas," Transportation Research A, Volume 31, No 3, 1997, pp. 205-218… Mark Hansen, "Do New Highways Generate Traffic?" Access, No. 7, Fall 1995, pages 20, 22 … W. Wayt Gibbs, "Transportation's Perennial Problems," Scientific American, October 1997.)	
187-01	C P		Thank you for your work putting together this plan, and for accepting and considering comments. Here are my responses to reading the plan: 1) I would like to see more investment in and commitment to providing alternative forms of transportation.	Comment noted.
187-02	C P		a) If the low investment in "active transportation" infrastructure is a result of the analysis conducted to identify the "optimal mix of strategies and projects that yields the highest return on investment," is it possible that some of the costs have been externalized from the analysis? What about the cost benefits of improved environmental and human health from active transportation? Has this been undervalued in the analysis?.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
187-03	C P		b) Currently, I rely solely on single-occupancy vehicle transportation. The reason I don't use alternative forms of transportation is because it costs significantly more time and money to do so. I would like to see our alternative transportation infrastructure grow to the point of dominating our mobility system. Only then will it become convenient to use.	Comment noted.
187-04	C P		c) Current bicycle infrastructure is severely lacking; we need much more investment in it. Even doubling it would not be nearly enough. Thank you.	Comment noted.
187-05	C P		The maps indicating Rail Transit System Growth from 1990 to 2035 show a significant slowdown of rail development in the 2012-2035 RTP. The routes and extensions identified are excellent, but we should invest more in the system. The map	Comment noted. The 2012-2035 RTP/SCS dedicates $55.0 billion to transit capital projects, $51.8 billion to passenger rail capital projects, and $139.3 in transit operations and maintenance funding. 46.9% of all investment in this plan is for

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			would be more useful in showing this if it included both time periods on the same map. Currently, I rely solely on single-occupancy vehicle transportation. The reason I don't use alternative forms of transportation is because it costs significantly more time and money to do so. I would like to see our alternative transportation infrastructure grow to the point of dominating our mobility system. Only then will it become convenient to use. Thank you.	public transit or passenger rail.
187-06	C P		Thank you for your work putting together this plan, and for accepting and considering comments. Here are my responses to reading the plan: I would like to see a more thorough analysis and presentation of the land use pattern. a) There is no map that shows the before and after regional development from now to 2035; there is no way to see how much sprawl will occur. b) I can't tell from the SCS chapter whether there will really be any significant change in sprawling development habits. Currently, it gives the impression there won't. I don't see that this SCS has "set forth a future land use pattern to meet GHG emission reduction targets." Thank you.	Comment noted. Appendix: SCS Background Documentation of the 2012-2035 RTP/SCS contains maps that depict the overall land use development pattern for the entire region in 2008, 2020 and 2035. These maps set forth a future land use pattern to meet SCAG's GHG emission reduction targets.
187-07	C P		Thank you for your work putting together this plan, and for accepting and considering comments. Here are my responses to reading the plan: Although the RTP meets the CARB GHG reduction targets, it will still result in an overall increase in GHGs (2005 pop of 17M at one unit of per capita GHG emissions vs. 2035 pop of 22M at .84 (1-16%) unit of per capita GHG emissions equals 18.48 units of per capita GHG emissions, an 8% increase!). The real goal is to counteract climate change and the only way to do that is to reduce our total GHG emissions. In my opinion, we should be investing as much as possible in those forms of transportation that reduce GHGs. I'm talking 90% of all our investments. And I say that as a single-occupancy driver who relies solely on auto infrastructure (for lack of better options). I know this plan is only required to comply with SCAG's targets, but because of the importance and power of addressing environmental problems at the regional level, I wish this regional plan would be more ambitious. Thank you.	Comment noted.
188-01	Carol Teutsch		Thank you for the comprehensive SCAG RTP currently in draft format. I have viewed your video and attended one of your public meetings. Many of the comments offered in the public forum reflected interest in the active transportation elements	Comment noted.

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			and delayed funding for implementing these concepts which I am sure you took note of and which reflect my own priorities. Having individual mobility on freeways as a key objective is not sustainable and we should shift away from that as a priority.	
188-02	Carol Teutsch		I am a physician deeply interested in the environment and in the impact of our environment (built and natural) on our health. TRANSPORTATION IS HEALTH. I am delighted with the Health in All Policies document put in place for the state by our former governor, but feel its careful recommendations are not being given adequate prioritization in your thinking. www.sgc.ca.gov/workgroups/hiap.html	Comment noted.
188-03	Carol Teutsch		I am new to southern California, having moved here from the east coast. The area is captivating and we need to protect it—not pave over more of it and not continue to building polluting solutions.	Comment noted.
188-04	Carol Teutsch		I would like to see to health risk and health impact assessments as part of your standard operating plan development. The externalities of health and environmental impact must be known because they affect long costs and benefits, which is your responsibility in these long term plans. A very nice and recent example of integrating public health objectives in transportation planning can be seen in an independent research report from the Victoria Transport Policy Institute (www.vtpi.org) (http://www.vtpi.org/health.pdf accessed March 27, 2011).	Comment noted. The Program Environmental Impact Report for the RTP/SCS included a Health Risk Assessment in Appendix F.
188-05	Carol Teutsch		I know that cargo movement is an essential part of your plan. Investing now in better options that are zero emission is key to the region's long term success. We could implement the "greenest" port in the world, helping our region, our citizens' health and demonstrating leadership for the world. There is concern about whether trucking is an appropriate choice for cargo transport and inappropriately subsidized by not accounting fully for externalities. The new GAO Report GAO-11-134 showed that " on average, additional freight service provided by trucks generated significantly more costs that are not passed on to consumers of that service than the same amount of freight service provided by either rail or water." This report puts an additional burden on SCAG to consider alternatives such as rail and appropriately include consideration of all externalities. (Full report at	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero (or near zero) emission trucks. SCAG also continues to support efforts by regional partners to address goods movement emissions and impacts on communities such as the San Pedro Bay Ports Clean Air Action Plan. It is not feasible to move all goods by rail, whether electrified or conventional rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. However, goods moving from the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail

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			http://www.gao.gov/new.items/d11134.pdf	as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.
188-06	Carol Teutsch		The tunnel proposal is of special concern to me since I live in Northeast LA. We will be bringing a corridor of damaging health effects up this way instead of solving the problem in the south 710 region. We see increasing proof of adverse health effects of ultrafine particles and no means to remove them in tunnel exhausting. We also need to see a robust model of costs of running tunnel ventilation which is very expensive. I have many additional references on tunnels and how they concentrate pollutants if you need them. The large ventilation shafts in residential areas are visually and from a health perspective undesirable. We also attract trucks to our roads which are not held to the same pollution standards---from Mexico and in construction. I would like you to directly address these issues in your RTP.	Comment noted. Issues regarding use, design, cost, and location of ventilation shafts are not addressed at the regional-level analysis of the RTP/SCS and would be addressed as part of project-level engineering and environmental studies that are developed by implementing agencies and not SCAG. All projects must comply with CEQA and be properly mitigated.
188-07	Carol Teutsch		We are all concerned about jobs. The link provided is by a highly respected transportation expert and deals with questions of jobs http://www.uctc.net/access/38/access38_transportation_growth.shtml.	Comment noted.
188-08	Carol Teutsch		You have a difficult job, but it is clear that you can never build your way out of the terminal congestion we have on our freeways. There is no uncongested freeway in the area. The models that are often used do not consider adequately induced demands and changing patterns and many secondary variables. We need to provide alternatives and shift incentives to reduce demand on the freeways for individual and truck mobility so our current freeways can function efficiently most of the time. We need to coordinate smart land use with transportation. There are a lot of creative thinkers and voices. Let’s work together to come up with the best solutions!	Comment noted. The RTP/SCS identifies a comprehensive, multi-modal set of transportation and land use strategies to address the region's transportation challenges. It is updated every four years to regularly reflect changing technologies and conditions.
189-01	Catherine Paquette-Richardson		I am taking this opportunity to write to you to comment on the 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). I am from the southern area of Orange County, California. In general, where the RTP is planning on expanding the freeway network system and local roads, I am in agreement. Expanding the use of transit (bus,	Comment noted. All major transit capital projects go through an extensive period of study and review, to be conducted by the lead agency. These include an Alternatives Analysis study, an Environmental Impact Report/Environmental Impact Statement and preliminary engineering documents which estimate the need for additional transportation choices.

ID	Name	Affiliation	Comment	Response
			commuter rail) should only be done where studies show there is a greater need, which would minimize having to use precious tax dollars to subsidize this transit. Bicycle paths are great, but they should not be seen as an alternative to general transportation but rather mainly as recreation.	
189-02	Catherine Paquette-Richardson		High-speed rail should be postponed until California is once again a booming state and unemployment is maintained or lower than 5.5%. Record number of businesses and people are leaving California, which is one reason why there will be a tax revenue shortfall in the billions of dollars. In fact State Controller John sent a letter to the California legislators announcing that the State will run out of cash on March 8, 2012. He stated that the legislature will need to allow the State Treasurer to delay $2.4 billion in payments to universities, counties and Medi-Cal, and will need to borrow another $3.3 billion from Wall Street bankers.	Comment noted.
189-03	Catherine Paquette-Richardson		I understand that we are spending $700,000 daily just on the California High Speed Rail Authority staff and consultants. This is not the best use of taxpayer dollars at this time. The cost of high-speed rail continues to be underestimated time and again. Ridership is suspect and with each year, more and more taxpayer's monies will have to be used to support high-speed rail. Its reduction on GHG will in no way match these exorbitant costs.	Comment noted. The annual operating budget of the California High Speed Rail Authority (Authority) is determined by the state legislature in conjunction with the Governor. SCAG has no control over those funding marks, but will continue to work with the Authority to refine these cost estimates.
189-04	Catherine Paquette-Richardson		When your report states that the region wastes over 3 million hours each year sitting in traffic, mass transit would waste perhaps comparable hours, if not more, having to get to the transit stations, then wait for a bus or rail, and again need to get to our final destinations. Besides, transit travel in southern California is not conducive to our lifestyle. It is certainly not friendly to families. Our preferred life style in southern California is single-family homes separated from industry and business zones. Clumping people in high-density living just to reduce the use of vehicles is forcing people to change their preferred lifestyle and not giving them a choice. Freeways around these high-density areas will eventually impede traffic flow from city to city.	Comment noted.
189-05	Catherine Paquette-Richardson		The only thing unsustainable to this preferred lifestyle is the limit and restrictions arbitrarily placed on our resources by government to appease the radical environmental groups and	Comment noted. State laws requires SCAG to demonstrate achievement of the greenhouse gas emission reductions targets as part of the 2012-2035 RTP/SCS.

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			individuals. There is also disagreement as to whether GHG cause global warming which our government has refused to question.	
189-06	Catherine Paquette-Richardson		What is most important in California right now is to stay within a balance budget, to cut or postpone spending and to relax regulations so we become more business friendly. Our tax revenues would then grow. Unfortunately, if there are no funds to pay for all of the RTP, then its plan needs to be postponed indefinitely. I am not be in favor of increasing taxes, fees or penalties in any form to try to obtain funds to pay for the RTP. I will be voting against all tax increases or bonds.	Comment noted.
190-01	Cathy Richardson		I'm against this basically because when you do the research, there is reasoning, there's eminent domain, things that are going to happen that we aren't even imagining. So I want to know if this is something that is going to be clearly laid out that voters can understand and vote on, or is it just going to happen? Do we have any say and things can be redistricted and eminent domain can come in and take out whole communities? Is it just because this one Proposition has passed, all these other things are added to it without people being able to protest?	Comment noted. SCAG is mandated by state legislation to develop a "Sustainable Communities Strategy. "This process does not require local jurisdictions to rezone nor does it involve the use of eminent domain. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region, local jurisdictions maintain local land use authority.
191-01	Cristi Ritchey		We do not want anything else to be "fixed" nor "sustainable? The majority of valid scientists agree that Global Warming is utter nonsense. We do not want any of our tax dollars going to it.	Comment noted.
192-01	Cyrus Hojjaty		Greetings SCAG, Cyrus Hojjaty here and I arrived at your meeting and voiced my concern over the 2035 General Plan and SB 375. Despite the fact that it is true that some people enjoy living in mixed-use buildings, take mass transit, and walk to their daily needs, this plan not only does not meet the desires effectively of those individuals, but does not meet the demands of others. Many of these plans are costly, unnecessary, and invade peoples lifestyles whether they choose to change or not. It seems understandable that many of the policies that SCAG is trying to implement are trying to reverse the policies that were created by the coded car-dependent cities since the 1930s. It is true that many of these urban policies have understandable concerns, however at least the most important benefit is that many people are able to get single-family homes and some free-flowing traffic. We must preserve these benefits instead. What is so depressing that even though SCAG criticizes the car-	Comment noted.

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			dependent lifestyle we currently have, it was heavy intervention that created the system in the first place! As a matter of fact, many of these areas involving strip malls, collector roads, housing subdivisions, etc… were heavily manipulated by codes, regulations, and subsidies. So basically the association does not want to admit that the system was caused by heavy intervention and yet they act like as the "saviors" to this problem to bring even more intervention. Sadly, many do not understand because of the different "buzzwords" and looks of the project. Give me a break! We are not mice! We are humans! We are not supposed to be treated in lab experiments whether it is a car-dependent landscape or a high-density packed environment!	
192-02	Cyrus Hojjaty		What is deceptive and problematic, is that events are used to manipulate the decisions of the citizens. People are wrongfully being concerned over resource-depletion and man-made climate change. These concepts have heavily been debunked by many scientists and yet the temperatures have even rising in other planets as well! Do we really have to trample down on people over a belief that is heavily flawed? This does not sound like improving the lives of the many to me! Besides, we so much land available left in Southern California. With so much vast miles vacant land, why can't alternative town complex get built instead that COMPETES with what we have instead of monopolizing? I mean even if the 2035 was a wonderful approach, there is no need for monopolies. Urban planning is not a natural monopoly. In fact, during the meeting I display an alternative plan that does instead compete. SCAG should probably learn from a 19 year old, who has not even been to school to study urban planning!	Comment noted.
192-03	Cyrus Hojjaty		Many of your projects in SCAG listed for Orange County are quite concerning yet some necessary. For land-use, let the developers and the marketplace decide if the mixed-use designs are necessary. Allow flexible zoning codes to let people decide whether it will be strip malls, attached homes, office strips, or mixed-use. Of course you do in some areas want to restrict development like industry, toxic waste dumps, etc… For goodness sake, do not add any regulations, codes, get huge subsidies, and threat public and private property. My suggestions for the highway improvements and upgrades are	Comment noted. SB 375 legislation does not require that a jurisdiction's land use policies and regulations be consistent with the SCS. While the SCS is intended to provide a regional policy strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.

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			letting construction occur when the REAL unemployment rate (Not CPI junk) for Orange County dips below 8.5%. I defiantly opposed to unnecessary projects like the high speed rails, road tolling, smart streets, rapid connectors, and the high-frequency Metrolink (unless if the ridership is high.)	
193-01	Cyrus Hojjaty		If you go back, we did mixed use a hundred years ago, but we didn't have these General Plans. We didn't have all these bogus regulations and laws. It was really the market that did this and then in the 1930s or 1940s, you guys made it illegal to do these things. You said it's all about car dependency and housing subdivisions and strip malls. So you talk about how things are so drivable, but yet it's the codes and regulations that the special interest groups have lobbied that cause the problems we have today. So why should we have you guys act like the saviors and make things even worse. There's a high chance that I'm going to live here in Orange County. There are a lot of desirable factors here and so it's amazing how the problems were created by the planners and the codes and regulations. That's why we have strip malls because they were created to benefit the "Big Box" corporations. And now you want to do eminent domain and add a lot of laws and get people out of their cars. We have a right to meet our own needs. If you guys want transit and you want mixed use, or if you want large lot homes and free flowing traffic, then pack your bags – go out into vast empty land and build your dream city there.	Comment noted. SCAG is mandated by state legislation to develop a "Sustainable Communities Strategy" as part of the RTP.This process does not require local jurisdictions to rezone, nor does it involve the use of eminent domain. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.
194-01	Dan Crain		The Regional Transportation Plan would hold that much more strength if it included the GreenRail/Intelligent Design (G.R.I.D.) element. This G.R.I.D. proposal would reduce diesel truck emissions and truck traffic - plus the undergrounding of freight movement would make for safer highways. The G.R.I.D. proposal, using an underground automated freight conveyance system, would also include underground automobile transportation corridors that would have NO impact on the above ground environment, a feature which the Sierra Club fully endorses. In addition, thousands of good jobs to assist our southern and inland California economies would be created in committing the design from paper to reality, building additional port infrastructure in the ports of Los Angeles and Long Beach, digging the tunnels and manufacturing the light rail systems for the effective conveyance of freight. Frankly, this is an absolutely	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional

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			BRILLIANT proposal that would enhance the quality of life for millions of residents who call southern and inland California their home. As a former Yucaipa Mayor and Councilmember from 1992 - 2000 (and SANBAG representative), an Inland California community where truck traffic is exceedingly prevalent on the 10 freeway, I heartily endorse this proposal. I ask that the SCAG Board of Directors include the Green Rail/Intelligent Design Proposal in all your deliberations for the Regional Transportation Plan's EIR. Thank you for giving every serious consideration to these comments.	stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to identify potential solutions to regional freight challenges.
195-01	Danny Morgan		We need to come up with a underground rail system to move containers from the ports to the inland valleys.	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
196-01	Darryl Parker		We support the building of the Highgrove Metrolink Station. Thank You The Parkers	Comment noted. Station-stop site selection for local projects is a local issue, and is the responsibility of a project's lead agency within each county.
197-01	Deirdre Hennings		I strongly support Senate Bill 375.	Comment noted.
198-01	Denise Savoie		I believe revenue projections are unrealistic and program costs unsustainable. Expenditure projections astronomically surpass what voters, like myself, supported when the HSR measure was approved.	Comment noted.
198-02	Denise Savoie		HSR needs to be taken back to the voters. Cost estimates are inexcusable...especially in an economic climate with revenues	Comment noted.

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			decreasing and with cuts to vital social service programs and education looming...the CHSR Authority needs to be held accountable for bringing voters the project they approved!	
199-01	Dennis Baxter		As a former San Bernardino City Council member, I am anxious to see greater transit service availability for low income residents of our region. Those of us who are easily able to slightly increase our funding of these necessary investments must step forward and approve such expenditures as others did before us.	Comment noted.
200-01	Elise Kalfayan		SCAG's draft 2012 RTP and its EIR are both flawed, do not meet AB32 and SB 375 goals, and will not move this region toward better mobility, an improved economy, or sustainability. The plan advocates expanding and extending urban highways, building a dedicated truck route for freight movement, and creating more conventional goods movement platforms such as the BNSF SCIG project. According to the EIR, these have "significant and unavoidable impacts." The plan's slate of projects will worsen air quality, increase congestion and safety risks on roadways, pose threats to public health, and degrade the environment overall and specifically of those communities adjacent to such infrastructure.	Comment noted. As discussed in Chapter 5, the 2012-2035 RTP/SCS is estimated to reduce congestion, improve travel time reliability, improve air quality, and reduce greenhouse gas emissions.
200-02	Elise Kalfayan		[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 35.
201-01	Erin Cornwell		I was bit surprised and disappointed that 2012 Regional Transportation Plan concluded that the best solution for the Goods Movement Strategy was more lanes of truck traffic. The vision of SCAG is simply to build truck-only corridors, actually freeways, that may "improve truck operations and safety….and provide a platform for the introduction and adoption of zero-emission technologies." If SCAG really had a vision to accomplish these things, then a better goal would be to remove the trucks from the system entirely. Why not consider an underground system that would limit land surface development? The Green Rail Intelligent Development (GRID) system may just be the perfect solution. This system would move cargo containers through a series of underground "subways" directly from the port to the distribution city. This system would be zero-emission on day one, not after some costly regulations kick-in. The trucks would still be removed from roads, which would be safer and cost taxpayers less in	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with

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			highway maintenance. It would also reduce additional "eye-sore" freeways, reduces noise pollution and free land surfaces for other more economical developments. I believe that it would behoove SCAG to consider this as a solution.	stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
202-01	Ezequiel Gutierrez		Public Participation The work of SCAG is challenging and must address extensive policies, programs and laws on local, state and federal levels. One requirement that was noticeably absent throughout the Draft RTP/SCS process was compliance with the requirements of the Environmental Justice Order of the U.S. Department of Transportation (DOT). The order can be found in 62 Federal Register at 18380. The public participation required in the DOT Order is much more extensive than what was afforded in SCAG public participation efforts, as described in the Draft RTP/SCS and experienced by the undersigned. The Order required a marked elevation of public participation by communities of concern as stated "during the planning and development" of the Draft RTP/SCS rather than providing for a passive audience to occasional presentations by SCAG staff with limited time given for contemporaneous comment. The non-compliant efforts were not without adverse consequence in providing for environmental justice; a great deal more work remains to be done, as more fully set forth in comments by Climate Plan and its partner coalition. It is feared that without addressing those concerns, the environmental impacts on the SCAG region will be significant and wide spread. A draft RTP/SCS that is responsive to all residents of the region would address the needs of the entire economic spectrum of the region, not for political acceptance but as the best policy for dealing with growth, regional management and environmental impacts.	Comment noted. From comments relating to the 2008 RTP, SCAG staff identified environmental Justice as a key concern for further follow-up. As such, SCAG held two environmental justice workshops and convened focus groups on the environmental justice analysis in an attempt to enable a large segment of the public to participate meaningfully in the planning process. On June 24, 2010, SCAG held a workshop to review the planning process and familiarize the participants with the environmental justice analysis process. On June 30, 2011, SCAG held a follow-up workshop to discuss the proposed new analysis areas with stakeholders and seek further input. In response to comments from the first workshop, SCAG also included a summary of the modeling process. A majority of the region's Environmental Justice organizations were represented at both workshops. As part of the workshops, SCAG emphasized that participation by the environmental justice community in the plan development was strongly encouraged and welcomed. SCAG further offered individual meetings and presentations to environmental justice groups, at their convenience. All the workshops were properly noticed and advertised to nearly 250 stakeholders. In addition to the special environmental justice workshops, SCAG held a workshop for Resource Agencies during development of the RTP/SCS, where environmental justice was a primary focus. Furthermore, environmental justice stakeholders have been involved throughout the planning process including regional goods movement efforts. We look forward to continuing to work with environmental justice stakeholders.
202-02	Ezequiel Gutierrez		Environmental Impacts If the economy of the region is well served by this planning, and significant growth is encouraged, transportation demands by the entire economic spectrum of the region will be greatly increased. The demands on the currently overloaded transportation system of the region which we have all experienced will itself be greatly increased into an unresolvable gridlock. Persons from communities reflecting the entire economic spectrum of the region commute daily and without adequately providing for them, as discussed by the	Comment noted. SCAG has shown a commitment of environmental justice analyses through its RTP process. The RTP/SCS evaluates region-wide impacts on various demographic groups. New to the Title VI and Environmental Justice analysis for the 2012 RTP/SCS, SCAG has mapped exposure to ozone, concentration of particulate matter emissions, cancer risks, and respiratory hazard risks. In order to assess the impact of emissions on various demographic groups throughout the region, emissions information was summarized to the

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			coalition, transportation disaster in the not too distant future is certain. Without incorporation of responsive planning, through those efforts described in the coalition comments and through full compliance with the DOT Order, the Draft RTP/SCS and its related Draft PEIR are fundamentally not certifiable. Request is respectfully made that SCAG charge its staff with pursuing responsive planning, as recommended, so that all communities of the SCAG region and so that the region itself may benefit from these dedicated efforts.	Environmental Justice communities. In addition, the Program Environmental Impact Report for the RTP/SCS included a Health Risk Assessment in Appendix F. SCAG complies with all relevant state and federal guidance with regard to environmental justice and Title VI, including DOT Orders on environmental justice. SCAG will continue to work with stakeholders to address environmental justice and Title VI in the transportation planning process.
203-01	Ezequiel Gutierrez		I have noted that through the years a lot of the planning is done in parallel fashion, there is not too much correspondence between the various planning agencies. This has not improved through the years and that is an area in which more progress needs to be made. SB 375, which this document addresses, falls short of what SB 375 is requiring. SB 375 is not really requiring another plan but a strategy as the name explicitly says. The strategy is to implement AB 32 and along that line, because it is an implementation strategy and what is really called for by the State Legislation, there needs to be more efforts toward making sure that those goals are going to be met. For example, a lot more monitoring and evaluation of performance goals should be make and should be set forth from this point. In the area of affordable housing, that is really dealt with more on an implementation level as opposed to grand plans. Without providing some kind of guidance to the jurisdictions maybe some model ordnances, some model programs, some suggested funding for affordable housing programs, I think the mission of SCAG as set forth has increased by SB 375 would fall a bit short. The document is well prepared but we need implementation in mind as it moves forward. Along that line, the corner stone of SB 375 legislation was transit oriented development and I feel the document fell short in that department. Because of the link between land use and transportation a lot more should be done by this document. Maybe it does not have to be rewritten now, but as time goes on more effort needs to be put in providing some kind of model, some kind of paradigms for jurisdictions to take a look at so they can accomplish what SB 375 and this document is trying to accomplish.	Comment noted. SCAG currently has a number of mechanisms for monitoring implementation of the RTP/SCS at the regional scale. Those include periodic reports on State of the Region, local profiles, Performance Monitoring and Assessment Program, periodic household travel survey and bi-annual FTIP update. SCAG will consider further updating our monitoring program for the RTP/SCS in coming years.
203-02	Ezequiel Gutierrez		There is a new book that came out by Ron Altoon, LA Architect, called “Urban Transformation, Transit Oriented Development,	Comment noted.

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			and the Sustainable City". The book cites about a half dozen different transit orient forms. For example the TOD that everyone is familiar with but also Transit Adjacent Development (TAD). I think SCAG could be a tremendous service to its jurisdictions if it provides that sort of thing. It should be integrated into this document so that when member jurisdictions look at the document they have some guidance from SCAG on the different possibilities, the different types of these transit area projects that they could take a look at and perhaps engage in some correspondence with SCAG Staff so that is accomplished. AB 32 and SB 375 is calling for more than just a plan and I think that by providing guidance, models, paradigms of transit oriented stations, a lot could be done to move the goals of this legislation forward.	
204-01	Gerardo Hinojosa		I have reviewed most of the content of the environmental impact report and wish to state my comments. Removing big rig traffic from our already congested freeways near the harbor and 710 corridor is a fantastic plan. I dread traveling on the 710 freeway knowing the big rigs will hinder the efficient flow of traffic. I feel unsafe every time I travel through the corridor on my way to do business in Long Beach. The action of vehicle drivers darting in and out of traffic lanes in order to avoid the big rigs creates unsafe conditions. The plan should go further. I believe big rig traffic should be kept on the outskirts of highly populated areas. Why not have an underground subway type system which will move freight containers on rails to various big rig collection/distribution points throughout southern California. Freight is unloaded from the ships, placed on transit units, which are then sent through the underground rail system. The underground rail system can be powered by electricity to minimize the fume accumulation within the tunnel system. Freight to be consumed is moved away from the port, freight for export would move back towards the port. The new collection points can be near existing rail yards for freight to be distributed across the country. Some of the freight has shelf life issues, so the shorter in transit time the fresher the product will arrive at its intended destination. An underground system would provide jobs for tradesmen. I do not have to go any further with this. Californians need jobs.	Comment noted. Increased safety is a major area of focus for the 2012 RTP, especially with regard to goods movement. The separation of trucks and passenger vehicles offers the opportunity to reduce accidents by limiting their interaction. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
205-01	Gerry Lease		Dear Mr. Lieb (and Committee members who may be involved	Comment noted. Local, regional, and state partners, including

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			in this undertaking): I have thoroughly read and am opposed to your Comprehensive Regional Goods Movement Plan. I do not believe the truck-only lanes you are recommending to be a effective way of handling this issue. Have you given consideration to moving freight underground? It would be much cleaner, and would save our roads, to say nothing of how it would help traffic bottlenecks. Car pool lanes have not proven to be an effective solution for Southern California's freeway traffic problem. Suggesting truck only lanes as a better way to address traffic issues on Southern California highways is not forward thinking in this century and would not do the trick. If you feel strongly that it would, then incorporating electric power should be required in order to eliminate the pollution from the trucks. However, you still have the issue of the wear and tear on the roads! I truly believe an underground freight movement system would be the most effective and GREEN. I have recently seen a presentation to build a goods-movement pipeline system underground to and from the port, that would allow for automated fright delivery and be cost-effective. That route could include the corridor you describe in your transportation plan. For Southern California, this makes all the sense in the world to me. We are saturated with cars, trucks, motorhomes and countless other vehicles on our freeways in Southern California. I believe you can come up with a much more viable goods-movement solution than the one you currently propose. UNDERGROUND gets my vote. Kind regards, Gerry Lease	experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to identify potential solutions to regional freight challenges. We agree that reducing emissions from freight activities is critical for the region. The 2012 RTP advances strategies for applying near-zero and zero-emission technologies to truck lanes and continues to evaluate advanced technology options for rail.
206-01	Ghassan Roumani		The Plan as indicated by the SCS City maps, will denigrate the quality of life for the residents of San Marino. My comments regarding the 2012-2035 RTP are limited to where I live, Oak Knoll Avenue in San Marino, and the adjacent area. While reviewing the Resources> SCS Map Tool from the SCAG web site, I was shocked to discover that Oak Knoll Avenue in San Marino has been designated a High Quality Transit Corridor. Oak Knoll Avenue is a 72 feet narrow, two lane street fronted exclusively by single family homes where children live and play. The homes, built between 1920 and 1950, and the set back is close to the street. The posted speed limit is 30 mph, the posted weight limit is three tons, and truck traffic is prohibited. The City of San Marino General Plan classifies Oak Knoll Avenue as a	Comment noted. Under SB 375, there are certain criteria areas must meet in order to be designated as a High Quality Transit Area (HQTA) or High Quality Transit Corridor (refer to California Public Resources Code Section 21155). One is that bus service must be offered with certain frequency during peak (rush hour) periods. Although your street is within an HQTA, this does not mean there will be transit service on your street, as service may be available on adjacent streets Local transit operators consider the criteria for HQTAs and make a determination on whether your street is a viable transit route.

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			residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street. How then, was Oak Knoll Avenue designated a HQTC? As Stephanie Johnson mentioned in her email directed to you dated February 11, 2012 regarding Los Robles the same applies to Oak Knoll Avenue in San Marino. Oak Knoll Avenue does not meet the definition of HQTC. Regional traffic should not be directed toward Oak Knoll Avenue, exacerbating the existing cut-through traffic and its resulting negative impacts upon the residents.	
207-01	Glenn Bailey		Looking at the numbers, I do not see the real game changing commitment. You are talking about State Legislation, Climate Change, etc. when you are putting in 6 billion dollars, which sounds like a lot of money for active transportation, but that is both bicycling and pedestrian and yet your total overall investment is 525 billion, that is just a little over one percent. If you look at the mode share for cycling and pedestrian, it is already above that now. If you goal is to make it even more, you should at least put in ten percent of the money for bicycle and pedestrian efforts. This could include some of the issues such as sidewalk repair but there are many other things that we should be looking at. One of the things that I thought SCAG was supposed to function as which was an overall umbrella organization coordinating the various public agencies, cities, and counties throughout the region, I think you have some work to do. For example, the City of Los Angeles has a bicycle plan that was adopted March last year and the County of Los Angeles has a bicycle plan that is going to the Board of Supervisors later this month. And yet, in the Counties plan they have designated various flood control rights-of-way for part of the network throughout the San Fernando Valley. They are saying it is part of their network and yet they did not have one of their public hearings in the San Fernando Valley, saying because it is part of the incorporated City of Los Angeles, not part of the unincorporated County of Los Angeles. How can they truly get public feedback and integration of plans if they do not have a meeting represents 1.4 million people.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
207-02	Glenn Bailey		Another example is Topanga Canyon Boulevards, which happens to be a state highway at the westerly edge of Los Angeles County, and yet is the only link between the City of Los	Comment noted.

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			Angeles, County of Los Angeles, and Simi Valley and Ventura County for cyclist to be able to get there. Although Topanga Canyon Boulevard was in the 1997 and the current 2010 RTP for bicycle lanes on Topanga Canyon Boulevard, when Caltrans approached the City of Los Angeles saying we are going repave and redesign Topanga Canyon Boulevard so we can implement your Plan, the City said no. Now it is a six lane highway up to Parthenia Street with more to come up to the 118 without any public notice. The connectivity between City of LA and LA County and Simi Valley and Ventura County, has not improved for the last forty years. You cannot ride on the 118 freeway it is a highway that was built in the early 1900's, curvy and narrow. So, this is a lack of coordination, a lack of commitment that I hope that part of this plan will change.	
207-03	Glenn Bailey		The Orange Line Bus Rapid transit facility, I understand that there is a grant that SCAG was part of that with regards to doing sustainability within a half mile of each of the stations along the Orange Line, this is a half-mile radius. It is inadequate to be looking at the real potential for getting folks to and from transit and sustainable, which is what this grant is about, by not going out four-five plus miles. This needs to be quantified and very specific in all of the documents. See how the younger generation is getting around in Hollywood. There are sometimes in the day, at some intersections, that the bicycles outnumber the vehicles. If you really want to get ahead of the curve and accommodate the younger generation, do it in this Plan.	Comment noted. The RTP is significantly increasing investment in Active Transportation facilities.
208-01	Greg Adams		Page 5: Kudos on your recognition of the problems associated with "first mile/last mile" logistics. In and of itself this aspect of a travel decision can be so expensive and burdensome that a well-meaning commuter must choose to drive the entire route despite public transportation availability along most of the route. I suggest you expand on this aspect of the plan. More bike racks on buses may not cut it; local shuttles by cities and park and ride pool vehicles to transportation hubs might help.	Comment noted.
208-02	Greg Adams		Page 7: I may have missed it but "Nominal dollars" in Table 2 (and in many other locations of the document) should be defined early in the report.	Comment noted. Nominal dollars means year-of-expenditure dollars and is defined in the Plan.
208-03	Greg Adams		Page 12: Increasingly today one hears very inflated claims about job creation resulting from a particular project which are largely unsubstantiated. Perhaps there should be a down-to-earth ,	Comment noted.

ID	Name	Affiliation	Comment	Response
			simplified discussion of what is to unfold jobwise, not relying on REMI algorithms but a common sense explanation of why 150,000-180,000 jobs per year will be created (and presumably sustained)as a result of the RTP implementation. Please avoid what has occurred in the world of green technology, for example. If one were to total all the job creation claims from all the alternatives seeking funding, there would be no unemployment in the United States. The role of lower education levels on the created jobs in the region needs more explanation.	
208-04	Greg Adams		Page 24: More explanation is needed as to the long term trend of declining commute trip carpool rates. It seems counterintuitive especially lately given rising gasoline prices. Does this corroborate with rideshare data reported to the SCAQMD?	Comment noted. The long term decline, as noted by the American Community Survey, is occurring nationwide and was impacted by the recession and not overly impacted by the fluctuations in gasoline prices in the last few years. AQMD requires carpool reporting as part of Rule 2202 employee commute reduction program (ECRP) for large employers at a single site. Participation in the ECRP has declined in relation to on-site emission reduction strategies between 2002 and 2007.
208-05	Greg Adams		Page 25 and 28: Improved fuel efficiency, alternative-fuel vehicle penetration, lack of inflation adjustors-all have contributed to gas tax shortfalls. Passenger vehicles becoming increasingly cleaner have diminished the benefits of reduced vehicle use and congestion management strategies thereby making conformity determinations more difficult. Both of these areas may be worthy of pursuing changes to the federal Clean Air Act or at least the regulations implementing the provisions of the Clean Air Act. This, added to the statement on Page 29 that emissions forecasted from just three sources-ships, trains and aircraft ("federal sources") that alone would lead to ozone levels near the federal standard, might be additional ammunition and support for selective changes to the CAA.	Comment noted. SCAG works closely with ARB and SCAQMD and other air districts in the SCAG region on NAAQS attainment and related issues associated with the Clean Air Act.
208-06	Greg Adams		Page 40- Transportation Demand Management: First mile/last mile strategies need more discussion per my remarks on Page 5 above.	Comment noted. The Transportation Demand Management Appendix describes first mile/last mile strategies in greater detail.
208-07	Greg Adams		Page 41-Congestion Management System: Non-recurring congestion accounts for almost 50 percent of all congestion on our roadway system. One suggestion is for SCAG to strike an agreement with CalTrans prohibiting road repair contracts from proceeding during daylight hours where the work of repair can cause enormous traffic jams. This past Sunday, on the I-10	Comment noted. SCAG's Congestion Management Appendix describes strategies for reducing non-recurring congestion.

ID	Name	Affiliation	Comment	Response
			freeway heading west into Banning, traffic was delayed 3 full hours, backing up all the way to Whitewater, for very minor road repairs that caused two of the four lanes to be cordoned off. Highway Patrol did not appear until an hour and a half into the action which suggests there might be better coordination of their activities from a congestion management standpoint.	
208-08	Greg Adams		Page 43-Corridor System Management Plans: Enhanced incident management must include the above recommendation. The California Highway Patrol (CHP) and CalTrans need to better coordinate. In the case of accidents, the CHP needs to develop expedited procedures and physical screening techniques to minimize the impacts of rubbernecking and the slowdowns that result.	Comment noted. The Congestion Management Appendix describes the use of Transportation Management Centers in coordinating the response to incidents and reducing the impacts of non-recurring congestion.
208-09	Greg Adams		Pages 51 and 53-Passenger and High-Speed Rail: The SCAG planning region will not be connected to the HSR network until 2033, 23 years into this plan. The HSR Authority's 2009 Business Plan posits that passengers will travel between Los Angeles and San Francisco in less than three hours, for about 80% of comparable airfare. Given that first mile/last mile considerations also exist, why would one choose such a means of travel? Do I presume correctly that the 80% airfare figure is the one-way plane fare in the 2033 timeframe? Given the astronomical cost of the project, might not those resources be better employed on more local and cheaper alternatives such as in-city rapid rail?	Comment noted. The commuter rail projects and high-speed and intercity passenger rail projects selected for inclusion in the 2012 RTP/SCS were selected by the High-Speed Rail Subcommittee of the Transportation Committee, to be forwarded to the Transportation Committee and the Regional Council for inclusion as fiscally constrained plan projects in the 2012 RTP/SCS. The selected projects were eventually approved by the jointly by SCAG's Policy Committees and Regional Council. The financial and productivity assumptions estimates of the California High Speed Rail Authority's Draft 2012 Business Plan are not considered in the 2012 RTP/SCS. To the extent that the business plan is a resource for the 2012 RTP/SCS, it is due to the presence of new project delivery strategies in the business plan, such as the blended approach.
208-10	Greg Adams		Page 71-Regional Clean Freight Corridor System: While truck-only lanes handling 58,000-70,000 trucks per day would be a challenge of the highest degree to implement, non-freeway alignments handling the same traffic flow would be an even greater hurdle, even with 100% ZEVs.	Comment noted.
208-11	Greg Adams		Page 86-The economic Outlook: The inability of existing excise taxes to keep pace with increasing transportation needs and the detrimental effects of increasing fuel economy on traditional revenue sources needs to be the primary focus of a SCAG lobbying effort in Congress at least to escalate the excise tax at the CPI rate.	Comment noted.
208-12	Greg Adams		Page 105- The plan's goal to seek to change the region from being known worldwide as the "capital of sprawl" results in a	Comment noted. The elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects

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			"densification" of the existing inner cities, to my way of thinking. Associated with that densification are costly infrastructure changes. Has a cost analysis of this consequence been performed? It is very difficult, as you are well aware, to plan for such effects of densification given the countering aspects of the recent RDA court decision and the re-distribution of funds to the cities that will result.	intended to support the policies in the 2012 RTP/SCS. SCAG will continue to identify funding resources for local governments pursuing such policies. The RTP/SCS did not provide analysis on likely impacts on infrastructure costs from densification except on transportation costs and investments. Nonetheless, SCAG growth forecasts were also provided to regional agencies such as MWD and the Sanitation District where impacts on infrastructure concerns raised here will be assessed.
208-13	Greg Adams		Page 123-Changing Demographics and Housing Market Demand The impacts of the recent RDA decision should be addressed in this chapter, even if the results are somewhat speculative. SB 375 combines transportation and housing planning by integrating the Regional Housing Needs Assessment (RHNA) process with the RTP/SCS. How will this nexus be impacted by the RDA decision? Would the example communities that are illustrated on pages 126 and 138, for example, been constructed in the first place without RDA assistance?	Comment noted. The elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects intended to support the policies in the 2012 RTP/SCS. SCAG will continue to identify funding resources for local governments pursuing such policies. The Final 2012 RTP/SCS has been updated, as appropriate. RHNA will not be affected by the elimination of RDA.
208-14	Greg Adams		Page 173- Table 5.3- Total Employment Impact Please provide an explanation as to how goods movement, logistics and distribution will be impacted by an expanded Panama Canal and a shift of some traffic to the Gulf Coast ports of the United States.	Comment noted. The expansion of the Panama Canal provides the potential for diversion of international cargo from the San Pedro Bay Ports. This diversion could have impacts for the regional goods movement system and its various components. However, the potential level of cargo diversion is unknown at this time. SCAG continues to work with its partners and regional stakeholders to reduce freight congestion chokeholds, increase reliability of goods movement and address the concerns regarding cargo diversion as a result of the project in order to increase global competitiveness.
209-01	Hank Fung		Land use: Part of historic resources is also recognizing the land use impacts of denser development on historic residential and commercial districts. The SCAG region has several commercial and residential neighborhoods which are on the National Register of Historic Places. Many of these districts are near transit-friendly areas which are slated for denser development under the RTP. In the development approval process, local jurisdictions should recognize those impacts and mitigate appropriately. SCAG correctly notes that revitalizing traditional downtowns has the greatest potential for accommodating growth in all communities in Southern California, but it should be done in a sensitive manner. As a result of increased land	Comment noted. The actions and strategies contained in Chapter 4 of the 2012-2035 RTP/SCS encourage various components of livable streets. Working with local jurisdictions, SCAG's land use and transportation strategies support better bicycling and pedestrian infrastructure, compact neighborhoods, and transit access. While the SCS is intended to provide a regional strategy that local governments may consider if they so choose, and generally includes the quantitative growth projections from each city and county in the region going forward, local jurisdictions maintain local land use authority.

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			prices and expansion in average space per person (i.e. families in which children used to share bedrooms now each having their own room), exurban and 2000's suburban developments are often more dense (less green space, more units per acre) than suburban developments in the 1950's, 1960's, and 1970's. This is a naturally occurring trend, but the problem is that these types of development are now placed in areas with poor transit service, thus increasing traffic demand. Conversely street design of the 1950's and beyond, focusing traffic on arterials (i.e. the half mile square street grid in Northern and Central Orange County) discourages pedestrian and bicycle usage. Through livable streets policies, SCAG should encourage design that is more neighborhood friendly and helps to spread out traffic instead of concentrating it in a few areas.	
209-02	Hank Fung		Transit quality: The definition of "high quality transit area" is extremely broad. Areas around park and ride lots in the suburbs with four buses an hour, two or three hours a day and no other service qualify. For example, Foothill Transit operates frequent commuter express service to traditional suburban areas, but only during peak hours. This policy could lead to the development of dense Planned Unit Development and condominium tracts, but with no appropriate transit service outside of bus service to a downtown area, where most residents do not work. SCAG should refine the definition, or create a new criterion, to reflect true quality service. Such a service would allow individuals to make most day-to-day trips, not just peak hour trips to work, via means other than individual passenger vehicles. "High quality transit" includes midday and weekend service, evening service for service workers to get home and for residents to enjoy a dinner and a movie, and should provide connections to multiple destinations instead of just a CBD. Otherwise any development near a park and ride lot could qualify as a HQTA and be exempt under SB 375, despite the number of trips generated therein. Although SCAG has no power to do so, it should encourage transit agencies to relax efficiency criteria to encourage provision of off-peak service. Often evening and weekend service is cut because it is not as cost effective as peak service, yet reduction of these services results in people purchasing cars and dropping off of transit use altogether. While no one is suggesting operation of empty	Comment noted. "High Quality Transit Areas (HQTAs)" are defined by Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008, the statute mandating the preparation of a Sustainable Communities Strategy within the 2012 RTP/SCS. California Public Resources Code Section 21155 defines a "high quality transit corridor" as one having fixed route bus service with service intervals no longer than 15 minutes during peak commute hours, or, as per California Public Resources Code Section 21064.3, a "major transit stop" is a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon commute periods. SCAG has a statutory mandate to follow these definitions. The elimination of RDAs may limit some jurisdictions' ability to finance various local plans and projects intended to support the policies in the 2012 RTP/SCS. SCAG will continue to identify funding resources for local governments pursuing such policies. The RTP/SCS did not provide analysis on likely impacts on infrastructure costs from densification except on transportation costs and investments. Nonetheless, SCAG growth forecasts were also provided to regional agencies such as MWD and the Sanitation District where impacts on infrastructure concerns raised here will be assessed.

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			buses, we should not penalize agencies for operating lifeline night and weekend service either. Improving span of service, as described in Page 49, should be more of a key. Also consideration needs to be given to fare policy. The San Diego Association of Governments (SANDAG) recently obtained fare setting policy for its jurisdiction, because it recognizes the connection between appropriate transit fares and its regional planning goals. All fare changes must go through the SANDAG board. Although SCAG may not wish to usurp the roles of the local transit operators like SANDAG did, it should recognize that appropriately set fares can increase transit ridership while still being fair to the taxpayer.	
209-03	Hank Fung		One way to do this is through implementation of a regional smart card. Although in need of improvement, the LA County MTA's TAP program has significant potential and could serve as a basis for a region-wide fare card, similar to ones in Washington DC, Seattle, and the San Francisco Bay Area. Business rules should be revised so transfers with a smart card are automatically provided. Such a card could eliminate the need to remember multiple fares or to carry multiple passes for inter-county travelers. The SCAG region should not make the same mistake as 511, in where San Bernardino and Riverside Counties have a different 511 system from Los Angeles and Orange Counties.	Comment noted. Implementation of the TAP pass program is identified as FTIP ID LA0G203, Transit Access Pass Integration. Additional fare media integration is a local issue to be addressed by individual transit properties, and forwarded for inclusion in future Regional Transportation Plans in the project submittal lists of relevant County Transportation Commissions.
209-04	Hank Fung		Road Pricing: In the past, a vehicle mileage tax (VMT) has been very controversial. It also discourages adoption of more fuel efficient vehicles, although arguably as fuel prices go up that incentive is provided anyway. A consideration could be made to freeze the existing gas tax at the current level, while imposing a VMT – but the VMT would have to go into real projects instead of just in a "black hole" general fund. The existing gas tax is not enough for operations and maintenance of existing highway facilities. Therefore, all new capacity should be tolled or otherwise have a funding source for maintenance that is corridor-specific.	Comment noted.The mileage-based user fee assumed in the RTP would be enacted by Congress (not SCAG) by 2025, and would be dedicated to transportation and would not go into the state or federal general fund accounts. We agree that additional resources are needed for operations and maintenance and to ensure a state of good repair.
209-05	Hank Fung		Strategic Plan: Unfunded capital improvements: Caltrans has declared that SR-39 through the San Gabriel Mountains from the Azusa city limits to SR-2 is excess and has asked the County of Los Angeles or the United States Forest Service to take over the roadway. Recently the San Gabriel Valley COG indicated that	Comment noted. The RTP/SCS Strategic Plan project list is based in part on Los Angeles County MTA's Long-Range Transportation Plan Strategic Plan. We have also analyzed the list to ensure that there is no double-counting of projects with other RTP project lists.

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			the extension of SR-39 through the San Gabriel Mountains to connect to SR-2 should be reconsidered. Although there would need to be significant mitigation for the Bighorn Sheep, this extension could provide significant benefit in improving access to recreation and for emergency response and evacuation. More importantly, the costs and benefits of this project have never been debated in a public forum with decision makers. The SR-39 extension from Crystal Lake to SR-2 should be added in the Strategic Plan for possible future funding eligibility. While reviewing the Strategic Plan project list, it appears that some of the projects in that list were already funded or are no longer being considered. For example, the SR-126/Commerce Center Drive grade separation project is funded. Parts of the Colima Road project have already been implemented or have been funded through the MTA Call for Projects, or are included in the FTIP or RTP plan. The Fullerton Road under UPRR is part of the ACE Phase II program. SCAG should work to verify that this list is current prior to RTP adoption and is not double counting projects.	
210-01	Hank Fung		With regard to freight movement strategies, in the past SCAG has considered making the truck only lanes “green lanes” for clean fuel and low emission trucks. This should be considered in any studies. Also, electrification of freight rail, while currently not funded in the short term, is a strategic long term improvement that should be strongly considered for implementation. This has the potential of eliminating a significant amount of emissions from diesel locomotives. Implementation of “inland ports” with freight rail connections to truck facilities in the Antelope Valley and the Inland Empire have a potential of bringing jobs into these economically hard hit areas.	Comment noted. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. This is included in the 2012 RTP. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Mainline electrification is not part of the constrained or strategic plans. As stated in the RTP, SCAG will work with regional stakeholders to further study applicability for the region. The RTP indicates that any effort to construct an electrified rail system would need the participation of both railroads (Union Pacific and Burlington Northern Santa Fe Railway). Recent studies by both SCAG and the San Pedro Bay Ports indicate that a number of challenges exist in regard to inland ports. The long term development and success of such facilities is unknown and dependent upon numerous factors such as market development, economic trends, and funding.
210-02	Hank Fung		[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 38.
211-01	Harvey Liss		I have an extremely important issue that affects air quality probably more than any other, and I don’t know how to have it	Comment noted. The RTP/SCS proposes investing $7.6 billion through 2035 towards Transportation Systems Management

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			considered. Only today, I became aware of the RTP review process and the meeting on Tuesday at the SCAG main office, at noon, from an email from Supervisor Pat Bates, and a deadline for public comment seems to have passed without my being aware of it. The issue concerns synchronization of traffic signals. There are hundreds of millions of dollars that have been spent and that will be spent, in theory, to synchronize traffic signals from Measure M funds (the Project P arterial synchronization projects). After a year of effort working with the City of Irvine, and doing other research on the matter, I made a horrible discovery, and that is that when a city (like Irvine) claims that it is synchronizing signals with Project P funds distributed by OCTA, they can end up only being synchronized for 5 hours/day; that is, only during the AM and PM rush hours, rather than all day. I interviewed city traffic engineers from two other Orange County cities and got very varying times of synchronization for their respective cities. OCTA, itself, on its website states: "The synchronization system is usually activated during morning and evening peak traffic hours…" Hence, when a city claims it is using Project P funds to synchronize signals, it could be mostly misleading, and I can explain why synchronization is often done in such a limited fashion. By contrast, the city of Austin, TX, synchronizes its signals from 6am to 11pm, and that only since 2005, because they have an activist city traffic engineer (with whom I've chatted) that truly wanted to do things right! This is the way it should be done. Here, again, I can explain what he had to overcome to make this happen. Synchronizing traffic signals the way it's done in Austin would probably have a bigger reduction of air pollution than any other policy change in Southern California. How can I get this issue turned into a mandate of the RTP? How do I begin? Who can I talk to?	strategies, including traffic signal synchronization. Traffic signal synchronization programs are typically implemented by county and local jurisdictions.
211-02	Harvey Liss		I'm certainly willing to come to LA on Tuesday to speak during the public comments period if I had some assurance that I would have an opportunity to speak; however, from reading the rules (total time of public comment limited to 20 minutes), it appears that I would likely have no opportunity to speak. And I have no idea what time I can show up to fill out a public comment card to assure that I would be in line early enough to get to speak, or if everyone is given an opportunity to speak, that I would have more than 15 seconds. This is a link to an OC	Comment noted. The RTP/SCS proposes investing $7.6 billion through 2035 towards Transportation Systems Management strategies, including traffic signal synchronization.

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			Register article about the work I recently completed with the City of Irvine: http://www.ocregister.com/news/city-327277-liss-traffic.html Is it too late to do anything about this? Do we all suffer another 4 years of incredible air pollution and wasted hundreds of millions of dollars, unnecessarily? Please help.	
212-01	Irene Rauschenberger		Re: The vision for the 2012 RTP/SCS - As a native Oxnard resident and layperson, I wish respond to the Ventura County Star 2/12/12 commentary on the transportation plan. (Columnist, Hasan Ikhrata) I'm particularly interested in the principle of mobility, it's impact on sustainability. As I see it, there is a great need for more bike routes and pedestrian spaces in the City of Oxnard where I live, albeit the need is important in all cities, and full filling this need would be a positive impact on our clean air and open spaces. In short, a designated class I/II bike route connecting Ojai, Ventura, Oxnard and Malibu would demonstrate mobility and sustainability profoundly! Ojai already has a class I bike route adjacent to HWY 33, Ventura has good bike paths on the beach that could be connected to Oxnard's scenic Harbor Blvd. to Wooley Rd. run east adjacent or in place of the RR track (that is idle) then west adjacent to Ventura Rd. there are huge drains that could be covered into bike paths, continue east on Channel Islands to "J" street west (another huge drain project currently under review) to connect to Hueneme Road, then head east towards Ormand Wetlands, and the PCH HWY to Malibu! Connections that would be the pride of Ventura County and a much needed mobile infrastructure. Respectfully… Resident of Oxnard	Comment noted.
213-01	Jaemi Jackson		In the Active Trans page 25, Tables 6 & 8 are exactly the same.	Comment noted. The tables have been revised.
214-01	James Fujita		I want to see the TAP card added to Metrolink. The TAP card has the potential to be for Southern California what SUICA is for Central Japan — one single, simple to use electronic and online fare payment system for an entire region. There is no reason — except for bureaucratic bickering — why the same card can't be used in Los Angeles, Orange County and other areas.	Comment noted. Implementation of the TAP pass program is identified as FTIP ID LA0G203, Transit Access Pass Integration. Additional fare media integration is a local issue to be addressed by individual transit properties, and included in future Regional Transportation Plans via project submittals by the relevant county transportation commissions.
215-01	Jason Herring		I am strongly opposed to solving regional transport planning through more freeway expansion. The current RTP focuses too much on legacy transportation modes and not enough towards forward-looking solutions to our congestion problems. Living in the Port area I am very interested in proposed direct-to-rail technologies such as the GRID SuperDock, which would create a	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts.

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			freight tunnel from the port to inland warehousing and intermodal areas. Please consider this more forward looking concept in your planning.	Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to identify potential solutions to regional freight challenges.
216-01	Jennifer Anderson		Nice Delphi comment form. I am aware of what you criminals are trying to do and you can forget it. There will be no agenda 21 in Southern California, no tax increases, no wildlands. I am a homeowner and I vote, and I am telling all of my neighbors and handing out information. Furthermore, I intend to see to it that those engaged in this subversive land grab are tried for treason against the United States. If you think you can get away with surreptitiously introducing the UN Agenda, you have got another thing coming. I will find out the names of the people responsible for this and publicize them as widely as possible. No passing the buck, each and every one of you.	Comment noted.
217-01	Jenny Wilder		In order to get into the 21st century and deal with the ever increasing population and transportation problems, it is necessary to provide some real transit alternatives to one person per car. This means that a more proportionate share of the available funds must be spent on transit needs and not on creating new freeways/roads. Please don't fall into the trap of spending transit funds on items that are NOT public transit. I live in Apple Valley and there are currently NO alternatives! There is a great need for metro link to San Bernardino, Rancho Cucamonga and Palmdale. The fact that the Cajun Pass is "too steep" is ridiculous and the High Desert Corridor as an alternative for people and goods between San Bernardino or even Los Angeles via Palmdale is incomprehensible. There are already a number of freight trains going up and down the Cajun Pass, but only one passenger train. We need regular transport service to connect to the metro system in the Inland Empire-	Comment noted. Transit service in this corridor is identified in the 2012 RTP/SCS as RTP ID#7120008, Expand Point to Point Bus Service.

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			especially if the government envisions even more growth in the High Desert.	
217-02	Jenny Wilder		There is a great need for HOV lanes on the I-15 from Victorville to San Bernardino and Rancho Cucamonga, to the I-215 and I-210. Roads such as Bear Valley Road and Hwy 18 through the community must get a makeover. First, provide a free shuttle to get up and down the roads. Must be regular and frequent (every 30 minutes - stores can help fund this). Next: work on makiing the entry and exit of the main road limited by providing access to shopping from parallel streets behind the current shopping centers.	Comment noted. The RTP/SCS proposes HOV lanes on I-15 from Victorville to the Riverside County Line. The RTP includes local street improvements to Bear Valley Rd and SR-18. The local jurisdictions are responsible for project level evaluation, environmental review, and implementation.
217-03	Jenny Wilder		Do not allow changes of zoning along the main roads such as Bear Valley Road that will increase traffic before making accommodation for that traffic or alternatives (e.g., a super Walmart outside Spring Valley Lake).	Comment noted. Local land use authority, such as zoning amendments, remains with local governments.
217-04	Jenny Wilder		Look at providing more walking and bicycling alternatives for short trips or to enhance transit options. A walking/bicycling path all along the Mojave River is a must. Provide bridges dedicated to walking/bicycling over the Mojave River and railway - especially to access the Community College. Meanwhile, reduce the speed over the current bridges to provide better safety for pedestrians and bicycles.	Comment noted. One of the primary goals of the Active Transportation Component of the 2012-2035 RTP/SCS is to increase bikeways in the region from the existing 4,300 miles to over 10,000 miles.
217-05	Jenny Wilder		Avoid sprawl developments (especially those which require a zone change) and encourage "in fill" developments that promote walking and bicycling.	Comment noted. Local land use authority, such as zoning amendments, remains with local governments. The 2012-2035 RTP/SCS focuses future housing and employment growth High-Quality Transit Areas (HQTA), which moves the region towards more compact, mixed-use development leading to more opportunities for walking and biking, more transit use, and shorter auto trips.
217-06	Jenny Wilder		Decrease the speed limit and provide traffic calming devices along Apple Valley Road near the 55+ community and in other areas with elderly residents. Provide bicycle/neighbor electric/handicap scooter facilities in and around these communities.	Comment noted. As stated in the RTP, the Complete Streets Act of 2008 (AB 1358) requires cities and counties to incorporate the concept of Complete Streets in their general plan updates to ensure that transportation plans meet the needs of all users of our roadway system. SCAG supports and encourages implementation of Complete Street policies in the 2012 RTP. SCAG will work with the local jurisdictions as they implement Complete Streets strategies within their jurisdictions by providing information and resources to support local planning activities.

ID	Name	Affiliation	Comment	Response
217-07	Jenny Wilder		The weather is great in the High Desert for walking and bicycling. Thank you for the opportunity to comment.	Comment noted.
218-01	Joe Portera		We need to invest in safer crosswalks and bikelanes, especially crosswalks by schools.	Comment noted. The Active Transportation Appendix includes Goal 3: Increase Active Transportation Usage in the SCAG Region by Adopting a Safe Routes to School Policy.
219-01	John Bednarski		I have been a resident of the San Gabriel valley for nearly 30 years, most recently living in Altadena for more than 20 years. I want to take this opportunity to voice my support for SCAG's plans to close the 710 Gap. Closure of this transportation gap will speed commuting for those of us that use that surface route on a regular basis, improve safety for those communities that presently are subjected to surface traffic up and down Freemont and Pasadena Avenues, and lessen air pollution as there will be fewer idling cars stuck in traffic jams as they slowly move through Alhambra, South Pasadena and Pasadena. While there has been noisy criticism of the 710 Gap closure from selected communities in the area, I do not believe that these communities necessarily speak for the thousands of private citizens like myself that support the Gap closure. I also suggest that SCAG look at aggressively moving up the schedule for the Gap closure. Right now, the program is scheduled to be completed in 2030. I firmly believe that schedule can be advance at least 5 years earlier, and a 2025 completion of the Gap closure is viable. How can this be done? I understand that a 3 year environmental assessment process is underway. During this time, conceptual design should be started on a variety of options, including the most obvious/logical option, the tunnel beneath South Pasadena and Alhambra. As soon as a Record of Decision is issued on the program, preliminary design should commence and efforts should start on gaining enabling legislation to perform the program under a Design Build approach (similar in fashion to what is currently being accomplished in Seattle, WA with the Alaska Viaduct tunnel). These activities represent about a 2 year effort. Next with the DB approach in hand, final design can start as soon as the DB firm is selected, and work can begin on procuring the tunnel boring machine. Allowing a 6 year time frame for the DB construction would then put the project on line approximately 11 years from today(roughly 2023), then add 2 years of contingency time in the planning window, and this gives a 13	Comment noted.

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			year timeframe from start to finish (2012+13=2025). This should be easily accomplishable. Tunnel boring machine technology is robust and relatively standard for the size of machines that will be needed for this double-decked bore. Mining 2 miles per year should be easily accomplishable. I support your efforts to close this transportation gap.	
220-01	John Bednarski		Please make sure to include a fast and convenient light rail link to LAX in your plans. The present light rail system is completely lacking in its ability to service LAX. I could never understand why a major city like Los Angeles could fail so badly in NOT being able to bring light rail transportation right into LAX. I would suggest that every major city in the USA has some form of direct rail transport right to their respective major airport. Yet in Los Angeles, this capability is sorely lacking. Those of you that make such transit plans for the region need to solve this obvious shortcoming and hopefully your solution provides a methodology for smooth and efficient travel-by-rail to LAX from numerous locations, like downtown Los Angeles. Thank you for this opportunity to comment.	Comment noted. This corridor will be served by project ID 1TR0101, the Metro Rail Green Line Extension.
221-01	John Bonilla		Mr. Jacob Lieb, I found my way to the Regional Transportation Plan while looking for emission reduction information. The South Coast Air Quality Management District Technology Symposium had information for import goods container movement emission reduction; the Green Rail Intelligent Development Project which made quite an impression upon me. While looking further into this plan I found information about the fully electrified rail running underground most of the time in massive pipelines which further impressed me and with the Angeles Chapter of the Sierra Club support of that project, it added to my opinion that this plan is very much worth considering. While looking into available information for that plan I found my way to the Regional Transportation Plan but was very surprised that the Regional Goods Movement System had information for the Potential East West Freight Corridor but did not include the possibility of considering the Green Rail Intelligent Development project or to place the East West Freight Corridor underground. I hope my comment to include the Green Rail Intelligent Development Project as a possibility in the final Transportation Plan as an alternate to the above ground Corridor is given additional consideration. I'm highly	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to continue to identify potential solutions to regional freight challenges. The 2012 RTP advances strategies for applying near-zero and zero-emission technologies to truck lanes and continues to evaluate advanced

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			impressed by the underground plan and feel that though the main concern is pollution in our air a strong secondary concern should be the visual, auditory and traffic impacts that could be avoided by having underground transportation rails. It's also my belief that while any plan would take a long time to complete, implementation of an underground system would help limit traffic impact during construction and avoid using land space that could in the future be used for other improvements. Thank you, John Bonilla	technology options for rail.
222-01	John Longville		I am amazed at how much testimony has been submitted, from one person after another, urging us to devote more resources to something other than just single occupancy vehicles. It is very clear from the testimony that is being presented that the people are in front of us. This is indicated as well by the polling that has been done. Move LA recently brought in a survey that indicated the amount to which the public would like to see us doing more for transit, bicycles, and pedestrian facilities. I hope that as the final stages of this process wrap up that SCAG will be able to accommodate some of these wishes in the shifts that will take place.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
222-02	John Longville		Thus far, there are a lot of wonderful things coming through this process but I am not confident that we have enough realism in addressing the financial needs for what needs to be done. Once again our people are in front of us. Most of our counties have adopted sales tax measures for transportation and they pass overwhelmingly. I want to thank SCAG for the time and effort the agency has put into the document.	Comment noted.
223-01	Jon Portera		These signatures represent just some of the children in the Oxnard Elementary School District; actually, they are from just one school. They were gathered by these same children during their recess time. For me they have a significance beyond the number 100 plus because the children responded from their heart for the fifth grader who was killed two years ago at a crosswalk near the school. Tragically, it would have been such a simple matter to have allocated more funds to have had a crossing guard on duty at an earlier time or to have had an illuminated and sounding	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local

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			crosswalk by their school. To now try to pay tribute to this young girl's passing by creating safer crosswalks and bike lanes, at or near school crossings, would be the most fitting act to remember her by, an act to prevent further tragedies like this from ocurring.	jurisdictions will be spending on Active transportation over the plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
224-01	Joyce Dillard		The CIRCULATION ELEMENTS of the regional cities GENERAL PLANS should be addressed as they expand to a overview of the regional needs and has a direct relationship to land use. This will also address the Military needs and national defense issues which are underplayed for the region. Per the Governor's Office of Planning and Research "Update to the General Plan Guidelines-Complete Streets and the Circulation Element:: …circulation element shall contain objectives, policies, principles, plan proposals, and/or standards for planning the infrastructure to support the circulation of people, goods, energy, water, sewage, storm drainage, and communications. Extreme weather conditions, atmospheric rivers, fires, floods are a concern of the Department of Water Resources and planning for the 200-year floodplain is reflected in AB 162 Wolk Government Code Section 65300-65303.4. Elements include: • Land Use • Conservation • Safety • Housing	Comment noted.
224-02	Joyce Dillard		Also consideration should be given to HUD Coastal High Hazard Areas and the incorporation of Protection Wetlands into Floodplain Management in a 500-year floodplain. Southern California has the worse extreme weather in the country. The CS San Bernardino Alluvial Task Force is rolling out an online/cell phone mapping tool in the near future. This should be employed. Remember, water vapor is a greenhouse gas.	Comment noted. The Program Environmental Impact Report includes an analysis of floodplains in the Water Resources Chapter. For additional response, please see the Final PEIR to the 2012-2035 RTP/SCS, Chapter 4, Responses to Comments on the Draft PEIR.
224-03	Joyce Dillard		The Goods Movement, in the Port of Los Angeles, is not so much about the port docks as the movement of goods to market (Harbor Commission meeting February 2, 2012). That connectivity is a key factor to the area receiving goods instead of the Panama Canal and should be taken more seriously.	Comment noted. The SCAG region serves as the primary gateway for containerized goods entering the U.S. for a number of reasons including, but not limited to, the nation's largest container port complex, a large internal market, an extensive system of regional roadways, a highly-developed regional rail system, an abundance of warehousing and distribution facilities, and geography. The infrastructure network provides a considerable advantage for transporting goods to the rest of the country. SCAG has explored potential diversion of goods through its studies on port and modal elasticity. SCAG continues to evaluate the impacts of the widening of the Panama Canal on the SCAG region and the need to maintain global

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				competitiveness.
224-04	Joyce Dillard		Aging pipelines infrastructure should be addressed at all levels included public utilities such as Southern California Gas. There may be black holes in jurisdiction making Public Health and Safety an issue not addressed. CTPG California Transmission Planning Group's efforts in transmission delivery should be addressed as part of Circulation.	Comment noted. The RTP/SCS does not have purview over utilities.
224-05	Joyce Dillard		ATBCB Pedestrian Facilities in the Public Right-of-Way issues will play a role in expenditures and compliance throughout the region as it effects productivity.	Comment noted.
224-06	Joyce Dillard		You are completely missing the expected aging population. Critical Actions aka hospitals etc. should be analyzed with the aging population. The LAUSD population and other school districts are important to incorporate for a projection of the future work force. Families, not density, is true growth.	Comment noted. SCAG uses the demographic and household projection models to develop the age composition, labor force, school enrollment, and households in the future.
224-07	Joyce Dillard		Air Quality solutions should be addressed as test sites are lacking to distinguish areas of non-compliance. Though trains may be a solution, diesel emissions and the particulates are not. Though density appears to be a solution, digital signs and ozone creating projects are not. We need to take seriously the extent of non-compliance for Particulate Matter and NOX, grandfathered land use and realistic solutions. Mapping is important to see where issues can be addressed and where they cannot.	Comment noted. The RTP/SCS includes mapping and other visualization techniques to facilitate communication of the technical analyses.
224-08	Joyce Dillard		Metropolitan Water District has a business plan and those plans should be addressed seriously as they manage water. That business model is not about variance. Use of Rainwater Harvesting, not a Title 22 Water, may be a larger problem if the State Department of Public Health and the Federal EPA do not address their responsibilities. Outbreak of disease, whether aviary or human, would cause extreme problems in dense areas and with public transportation.	Comment noted. The Program Environmental Impact Report for the RTP/SCS includes a chapter on Water Resources. For additional response, please see the Final PEIR to the 2012-2035 RTP/SCS, Chapter 4, Responses to Comments on the Draft PEIR.
224-09	Joyce Dillard		Debt services and fees should be addressed as baseline needs for Capital Improvements. Job growth is insufficient. Just what industries will relocate here. Who guarantees that a Transit Oriented District is available as a vehicles traveled reduction, if there is no real plan and no real attraction. Your allocations are as follows: Transit 10.41% Passenger and High-Speed Rail 10.81% Active Transportation 1.26% Transportation Demand	Comment noted.

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			Management (TDM) 0.84% Transportation Systems Management (TSM) (includes Intelligent Transportation Systems (ITS)) 1.42% Highways 15.15% Arterials 4.63% Goods Movement (includes Grade Separations) 10.04% Aviation and Airport Ground Access-Included in modal investments Operations and Maintenance 45.44% With Operations and Maintenance funding included the following percentages of your allocation are: Transit 39.60% Highways 27.03% Arterials 9.01% This is distribution is not realistic to the existing system and does no guarantee the growth that is needed for increased economy and for jobs. Sustainable Communities Strategy should be a complete overall picture.	
225-01	Joyce Dillard		For the LA County region and the City of Los Angeles, in particular, undergrounding of Utilities has not been included in the Community Plans, nor has it been addressed in a City of Los Angeles Circulation Element, as no such element, as required by law, has been prepared.	Comment noted. The RTP/SCS has no purview over utilities.
225-02	Joyce Dillard		Project LAF3148 has not been discussed in the community especially in light of the Public Health and Safety issues: North Main St Grade Separation. Construct a new grade separation over UPRR and Metrolink & LA River while preserving the historic Main St Bridge. This is #10 in LA County on the PUC grade separation list. Project site is located approximately 1 mile northeast of downtown Los Angeles, located on Main Street over the Los Angeles River between Wilhart and Lamar. North Main St. Grade Separation: Construct a new grade separation over UPRR and Metrolink & LA River while preserving the existing historic N. Main St. Bridge. Bike lanes will be added at the shoulders of the bridge. Other work components include realigning Albion Street and modifying the intersections of North Main and Mesnager Street at the west end.	Comment noted. This project was submitted by Metro as a new project in the 2011 Federal Transportation Improvement Program (FTIP) adoption cycle and went through the 2011 FTIP 30-day public review and hearings process. No comments were received for this project.
225-03	Joyce Dillard		Project LAD0169 has not been discussed in the community: BROADWAY IMPROVEMENTS FROM MAIN ST TO GRIFFITH ST. Construction of missing curb & gutter and reconstruction of Existing Pavement and undergrounding the overhead power lines. In this low-mod income area, please anticipate the loss of business and reach out to the public.	Comment noted. This project was included as a new project back in the 2004 Regional Transportation Improvement Program (RTIP) and carried over by Metro in each subsequent RTIP/FTIP (2006, 2008, and 2011). The project was subject to the 30-day public review and public hearing in each of those cycles.
226-01	Judy Bergstresser		The SCAG PEIR / RTP is flawed in the same way as the SANDAG RTP / EIR – they are inadequate under CEQA law. The joining	Comment noted. SCAG's PEIR adequately analyzes all potential environmental impacts and offers suggested mitigation

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			motion filed by the Attorney General of the State of California in the lawsuit against the San Diego Association of Governments (SANDAG) Regional Transportation Plan states that the Environmental Impact Report (EIR) prepared for the plan does not adequately analyze or prevent air pollution and climate concerns, and prioritizes expanding freeways while delaying public transit projects. The SCAG is similarly flawed and will not stand up to CEQA challenge.	measures for consideration at the project level.
226-02	Judy Bergstresser		I oppose all items in the draft RTP that recommend the expansion or extension of highways, for the following reasons: The fundamental law of highway congestion (Anthony Downs, 1962, 2004, 1992; and confirmed most recently by Gilles Duranton and Matthew Turner of the University of Toronto) states that the travel speed of an expanded highway reverts to its previous level before the capacity expansion and that the extension of interstate highways is met with a proportional increase in traffic in the U.S. SCAG's assumption that highway expansion reduces congestion and improves pollution levels is grossly inaccurate. The traffic modeling fails to fully account for generated and induced traffic. And therefore exaggerates the benefits of expansion and the does not reflect the severity of future congestion problems. The draft RTP anticipates adding 948 centerline miles and 7419 lanes miles which would be a 4.4% and 11.1% increase respectively. The SCAG RTP will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks throughout the Southern California region.	Comment noted. Increase in total VMT in 2035 over the current condition is primarily due to estimated increase of 4 million people over the plan period. However, VMT on a per capita basis will decrease over this period once the plan is fully implemented. While the Plan does include some needed highway improvements, including the SR-710 Transportation Improvement Options project, there is no evidence that these improvements would contribute to the total VMT increase in any discernible way. The 2012 RTP identifies a multi-modal strategy that incorporates transit, highway, and active transportation strategies as well as demand management and congestion pricing strategies to achieve overall improved system performance and reduction in GHG targets required under SB 375.
226-03	Judy Bergstresser		I oppose the 710 gap closure project as it is undefined and is not eligible to be on the Constrained Plan. The proposed SR-710 Extension Toll Tunnels, at $5.6 BILLION already underfunded by at least 50%, must be moved from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law for inclusion in the Constrained Plan. There is enormous internal inconsistency with the SCAG's six possible construction zones yet all actual estimates based only the previously defined Meridian Route alignment.	Comment noted. SCAG's 2012 RTP is consistent with fiscal constraint requirements set forth under applicable federal regulations and guidance, including the requirement that strategies for ensuring availability of new funding sources be identified. See 23 CFR 450.322(f) (1). "Fiscal constraint" means, in part, that the RTP includes sufficient financial information for demonstrating that projects in the RTP can be implemented using committed, available, or reasonably available revenue sources. See 23 CFR 450.104. The SR-710 project is proposed to be funded by both core (Measure R) and new, reasonably available revenues. SCAG documented that the new funding sources identified for the SR-710 project are reasonably available. As such, strategies delineating required

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				implementation steps for ensuring the availability of proposed new revenues are discussed in the Transportation Finance Appendix.
226-04	Judy Bergstresser		I oppose plan items in the draft RTP that recommend increased conventional roadway and rail yard capacity for goods movement. The RTP should instead include existing zero-emission goods movement alternatives. Goods movement must be accomplished via electrified freight rail not trucks. Goods movement proposals in the draft RTP are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan. The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (p. 68) and negative impacts in neighboring communities and throughout the region. However, the plan allocates billions of dollars to expanding conventional goods movement, saying "truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety.and provide a platform for the introduction and adoption of zero-emission technologies." Yet the plan does not require zero-emission technology.	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero emission trucks. The 2012 RTP includes an Environmental Action Plan that will lead to the deployment of zero emission technologies in the timeframe necessary to meet federal requirements. It is not feasible to move all goods by rail, whether electrified or conventional rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. However, goods moving from the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.
226-05	Judy Bergstresser		[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 43.
227-01	Karen Doris Wright		SCAG needs to INCREASE the percentage of funding spent on Bus Transit and Bicycle pathways, lanes, stripped areas that are WIDE enough to take us into the future 200 years and provide for adequate ways to get to work, school, home, events, public meetings with appropriate secure parking for bicycles near Metrolink, Bus, and other points. Currently a significant portion of the population in SCAG areas use public transportation, but the dollar amount to support necessary transit is insufficient. Say for example that 30 percent of the SCAG population relies soley on public transit such as BUSES or bicycles or walking. Yet less that 6 percent of the funding is spent for the transit of these people. Furthermore their basic transportation need is NOT MET, For example just within the City of Riverside, which is the County Seat for the County of Riverside, citizens in one area of the City, La Sierra and perhaps Arlanza, HAVE NO BUS ACCESS	Comment noted. The Draft RTP includes $252.8 billion for transit and active transportation, which represents nearly half of the total RTP expenditures. While SCAG recognizes need for additional funding, the region is constrained by how much funding may be reasonably available over the plan period. The 2012-2035 RTP/SCS provides a reasonable balance in funding for all modes of transportation while meeting the applicable fiscal constraint requirements under the federal regulations.

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			to RTA buses for about 12 a day from approximately 6:30 pm to 6:30 am. And for other areas of Riverside there is NO ACCESS TO BUS TRANSIT from approximately 10:30 pm to 6:30 am. This means that thousands of citizens are DENIED ESSENTIAL BASIC TRANSPORTATION needed to get them to jobs such as jobs in the medical field which are 24 hour jobs, to hospital and urgent care during those hours, cannot go out for a late dinner or show, cannot attend events in different venues in the Riverside area and cannot attend many public meetings or attend educational opportunities at schools, colleges, or universities due to the limitations on bus service. On the other hand on the ROADS/ARTERIALS/ FREEWAYS in the SCAG area those who own cars are able to get around 24 hours a day, seven days a week. SCAG is working to IMPROVE their driving experience by adding to roads, lanes, etc. But what is WRONG WITH THIS PICTURE. What is WRONG is that SCAG has DISENGAGED a SIGNIFICANT PORTION OF THE POPULATION in the SCAG area from opportunities to work, get educated, participate in the democratic process and to attend the many events put on across the SCAG counties BY DENYING THE FUNDING NEEDED TO SUPPLY BASIC NEEDED BUS SERVICE. The lack of SCAG focus and funding for this area impacts negatively on our air quality by forcing citizens into their cars. For example I live right by Magnolia in Riverside and could take the bus to the International Film Festival, to events downtown etc but have learned there are NO BUSES going home.	
227-02	Karen Doris Wright		Therefore I recommend that SCAG STUDY the funding distribution, and study the population within our area and determine who MUST use buses and who could use buses, and then based on that resulting percentage which I believe would exceed 30 percent of the SCAG population, allocate that amount of ALL FUNDS FOR ALL TRANSIT/ROADS/METROLINK etc. and apply that percentage to improve BUS SERVICE, BUS ROUTES, Late NIGHT and early AM SERVICE, BUS EQUIPMENT and an advertising program to encourage everyone to ride the bus from billionaires (and they DO RIDE THE BUS) on down and also education them how to ride the bus, with improves REGIONAL BUS signage, linking lines etc. Much less that 6 percent of SCAGs monies go to BUS SERVICE and it is UNCONCIONABLE that you ignore and underfund the bus	Comment noted.

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			service in favor of those with the means to buy a car. Educated, Many people all over the World ride buses in urban areas and to get back and forth from suburban areas. That includes Cambridge and London England, Paris France, New York NY, New Jersey, Toronto, San Francisco and the broader San Francisco Bay areas and the approx nine Counties. I personally have lived or traveled in all those locations and use the bus when in those locations to get around. Annually I visit SF in the month of November and when I get there I park my car and travel around the SF Bay area to my destinations using the bus. Should say that San Francisco and Davis CA also have extensive bicycle ridership and I too have riden bicycles to get around in SF and have noticed that from the 1970s to now a dramatic and extensive difference in bicycle ridership with extensive use of dedicated lanes and shared lanes and more all over San Francisco. This too could come to pass if ONLY SCAG would but some time and money into IMPROVING BOTH THE BUS SERVICE ACROSS THE SCAG AREA BY DRAMATICALLY INCREASING THE FUNDING from much less than 6 percent to a more reasonable amount, say 20 percent of the TOTAL FUNDING FOR ALL KINDS OF TRANSIT/BUSES/TRAINS/BICYCLES. and also doubling or tripling the amount allocated for bicycle lanes/stripped areas, parking etc. These Comments APPLY ALSO TO MANY OTHER TOPICS/CATEGORIES and their chapters and subsections, including the TRANSIT TOPIC. It applies to the Highways and Arterials, Highspeed Rail etc. as funding for those areas will need to be REDUCED until such time as SCAG provides NEEDED BASIC BUS SERVICE including late evening and early am across the SCAG area	
228-01	Karen Wright		• There needs to be an increased percentage of the funding used for bicycles and for bus service.	Comment noted. The 2012-2035 RTP/SCS allocates approximately $6.7 billion towards Active Transportation investments. In response to the overall feedback we have received and based on final reconciliation of our finance plan, staff is pleased to note that the funding for Active Transportation has actually been increased by $700 million over the Draft RTP/SCS that was released for public review and comment. This represents an increase of more than 270% over the commitments made in the 2008 RTP. Furthermore, this does not account for the estimated $4.1 billion, we believe the local jurisdictions will be spending on Active transportation over the

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				plan period based on their current expenditure pattern. Staff will continue to evaluating funding for Active Transportation and pursue new funding sources in future RTP updates.
228-02	Karen Wright		• There should be bicycle lanes at the over and underpasses in Riverside along the 91 where you're adding an HOV or carpool lane. This should be across the SCAG region.	Comment noted.
228-03	Karen Wright		• There needs to be lockable units for bikes through the region.	Comment noted.
228-04	Karen Wright		• There needs to be steps to get citizens out of cars. The city and county governments and federal agencies need to take away their free parking. It's a bad policy for cities, counties, state and fed to provide free bus passes when those entities also provide free parking spaces.	Comment noted.
228-05	Karen Wright		• Bus Transit - SCAG needs to develop a public relation program across all the counties to also encourage county and city employees and other business leaders to use buses.	Comment noted. The RTP provides for a significant increase in transit funding and projects to provide an incentive for people to use transit.
228-06	Karen Wright		• There needs to be funding for late night bus service. This needs to be provided so people can attend their city council and educational meetings.	Comment noted. The RTP supports increased funding for transit services.
228-07	Karen Wright		• Do not place high density housing only in downtown areas.	Comment noted. The SCAG region is geographically large and diverse, thus a variety of development patterns are encouraged. The future land use development pattern of the 2012 RTP/SCS promotes a variety of housing choices in varied locations.
228-08	Karen Wright		• Air Quality - High density housing should not be put along freeways or extremely busy intersections	Comment noted. There is substantial information and analysis on health risks related to air pollution from transportation infrastructure included in both the Environmental Justice Appendix and in the Program Environmental Impact Report. Staff has provided further analysis in the Environmental Justice Appendix, as part of the final RTP/SCS, as requested in several comments on this issue.
228-09	Karen Wright		• Safety at overpasses and underpasses	Comment noted. The Transportation Safety Appendix details goals and strategies related to reducing transportation injuries and fatalities.
229-01	Karyl Partenheimer		I am writing in response to the proposed Regional Transportation Plan for a truck-only East-West Corridor from San Pedro Bay Ports to downtown Los Angeles and on to San Bernardino County. While this plan could potentially alleviate some of the traffic along the I-710, I-60, and I-15 freeways, I feel it falls short of its potential. This plan does not address the opportunity to improve the environmental deterioration caused	Comment noted. The East-West Freight Corridor is envisioned as a zero (or near zero)-emission freight corridor which offers the opportunity to reduce harmful emissions including fine particulate matter. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges

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			by diesel truck emissions such as reducing fine particulate matter, improving air quality, and reduced noise pollution. I understand the Sierra Club has endorsed a plan for a proposed GRID Project Super Dock in which an underground tunnel is used to facilitate a drone train delivery system of containers emanating from the Ports of Los Angeles and Long Beach. This underground system would not only reduce the truck traffic along the local interstate highways, as proposed by the current RTP SCAG plan, but would also provide an unseen, unheard, and zero-emissions right-of-way alternative to the congested, environmental degradation system we currently endure. This new concept would greatly decrease air, noise, and traffic pollution as well as provide additional land space for future development. I strongly encourage further consideration of this alternate plan before we commit ourselves to an unnecessarily limited concept.	resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
230-01	Kathleen Danica		If a transportation plan is approved by SCAG, what will happen to private property of those whose land may be “in the way” of the determined plan?	Comment noted.
231-01	Kathy Huffmire		I am against this "sustainable community" against the re-zoning eminate [sic] domain etc.	Comment noted. SCAG is mandated by state legislation to develop a "Sustainable Communities Strategy,” as part of the RTP. This process does not require local jurisdictions to rezone nor does it involve the use of eminent domain.
232-01	Lars Clutterham		In the City of Downey General Plan of 2005, the City speaks about creating a bicycle infrastructure. In the City of Downey Downtown Specific Plan of 2010-11 the City talks about creating a bicycle infrastructure, it acknowledges that it does not have a master plan but hopes to move forward to that. SCAG awarded the City of Downey a Compass Blueprint Award for their Downtown Specific Plan. Yet in Downey’s contribution to their sub-regional SCS, the Gateway Cities Councils of Government’s SCS projecting out to 2035, they had no bicycle infrastructure planning. In addition, City Council of Downey within the last two weeks has confirmed an EIR and then authorized the development of a 1.5 million square foot shopping center, which as it stands, can only be accessed by single occupancy vehicles. I do not fault the City of Downey or its Councilmembers. They are looking for revenue and they have seventy seven acres they are trying to develop, but I feel a sense of great urgency and would like to encourage SCAG to envision	Comment noted.

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			a great deal more active and zero emission transportation. My sense of urgency has a couple of elements. It took the Netherlands forty years to change their transportation culture and I do not think we have that much time in Southern California.	
233-01	Matt Korner		I strongly urge the Southern California Association of Governments and its members to support, in the Regional Transportation Plan, the strategy that the City of San Bernardino adopted in 2009 to re-establish itself as the core of the Inland Empire and to reposition the municipality to compete in the category of first-tier cities, including Los Angeles and San Diego. Doing so will more fully support SCAG's Transect-based planning and will enable the M.P.O. to attain the most ambitious S.B. 375 targets. Improving livability and reducing pollution there will enable the Inland Empire to attract a greater diversity of incomes and skill sets and will, in so doing, help fix the regional jobs-housing imbalance whereby the coastal counties experience a lack of affordable housing and the inland areas a lack of high-paying jobs.	Comment noted. The 2012 RTP/SCS includes locally-supported projects that aim to turn the City of San Bernardino into a multimodal transportation hub.
233-02	Matt Korner		With the proper support, San Bernardino can emerge as a gateway city housing a million or two more residents since the municipality has the powerful combination of existing land-use intensity, extensive infrastructure, and copious amounts of vacant and underutilized land. San Bernardino is also located a sufficient distance from Los Angeles. Ontario has the land but lacks the infrastructure; Riverside has the infrastructure but lacks the land. As one of the two nexuses of the former Pacific Electric Railway, the centuries-old San Bernardino is the natural metropolis in the Inland Empire region and would have retained parity with Los Angeles and San Diego had investments in freeways and airports over the last sixty years not directed growth to the coast.	Comment noted.
233-03	Matt Korner		I strongly urge SCAG to reconsider the expansion of the 210 freeway that is planned between the 215 and the 10. The below-grade portion of this expressway, in fact, may be an excellent candidate for a highway-to-boulevard conversion that conforms to S.B. 375, that supports the CalTrans-funded T.O.D. Overlay District at the Marshall Boulevard sbX station, and that serves as a potential "Compass Blueprint" demonstration project. The community deserves an analysis of the available	Comment noted. The 210 freeway improvements have been identified by the San Bernardino Associated Governments (SANBAG) as a project for inclusion in the RTP/SCS. Projects in the RTP/SCS must comply with project-level CEQA/NEPA requirements, including the consideration of alternatives. At the conclusion of CEQA/NEPA for this project, SCAG will work with SANBAG on updating the RTP as appropriate to reflect any changes in the project description.

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			alternatives, especially since freeway widenings do not yield sustainable relief from traffic congestion. San Bernardino is doing its part to reduce V.M.T. through mixed-use planning and through the creation of fixed-guideway transportation systems; the city should be spared further sprawl-inducing and tax-base-undermining mistakes, and the residents should not see their health further compromised and their properties further degraded.	
233-04	Matt Korner		I strongly urge SCAG to support the I-215 alignment for California High-Speed Rail and for the optional station location in San Bernardino. This configuration is especially important for air-rail integration with both SBD and March Inland Port and for possible interstate service to Phoenix and/or Las Vegas.	Comment noted.
233-05	Matt Korner		I strongly urge SCAG to revise its allocations for regional aviation demand to more closely match those in the 2008 R.T.P. since San Bernardino International Airport was built, in part, with these allocations in mind and since requiring better ground access and air-rail integration will depend on the 2012 R.T.P. Disney's Magical Express at Walt Disney World should be used as a model for seamless integration between Metrolink and SBD, so that, for example, air passengers can check luggage at L.A. Union Station and can directly board planes at the inland airport from some sort of transfer available at the Metrolink station.	Comment noted. The 2035 air passenger forecast allocations in the Draft 2012 RTP/SCS are based on an air passenger forecast scenario that was generated for the 2008 RTP, called the Constrained Scenario. It is a more conservative forecast than the one that was adopted for the 2008 RTP, and was selected for the 2012 RTP since it more closely reflects recent air passenger activity trends in the region that have shown no net growth over the last decade. The new 2035 passenger allocation for San Bernardino International Airport, 2.8 million air passengers (MAP), is much more consistent with the forecast developed by the most recent SBIA master plan (2.5 MAP in 2023) than SCAG's much higher 2008 RTP forecast for SBIA (9.4 MAP in 2035). Disney's Magical Express is a unique service between a large international airport (Orlando International) and a large international tourist destination (Disney World) and its potential future application to airports in this region is limited.
233-06	Matt Korner		I strongly urge SCAG to incorporate the following concepts into the R.T.P.: • Development-oriented transit, transit-oriented development (with unbundled and restricted parking), and clean-energy car sharing are all mutually-supportive, and the three elements should be planned together. Every transit station, especially where connecting transportation is deficient, should have car sharing available. • Convert existing cars owned by private individuals to share cars. • Convert existing cars in governmental and other institutional fleets to share cars. • Since "last mile" travel is more complicated than "first mile" and	Comment noted. The Transportation Demand Management Appendix lists various strategies designed to entice travelers out of Single Occupancy Vehicles. In addition, the Congestion Management Appendix summarizes operational strategies to make the existing transportation system more efficient. It also includes a TDM/TSM Toolbox with various strategies and performance measurement criteria.

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			since residential uses tend to be more sprawling, concentrate more employment, leisure, and retail uses around transit stations and limit parking. • Enlarge catchment areas around transit stations through traffic calming and bicycle/N.E.V. lanes. • Allow N.E.V.'s to share bikeways throughout the region.	
233-07	Matt Korner		I strongly urge SCAG to incorporate the following concepts into the R.T.P.: • Mandate butanol to be used in existing gasoline engines. • Mandate bio-Diesel to be used in existing Diesel engines. • Develop and mandate algal fuels to be used in jet engines, especially at SBD. • Promote conversion of existing Diesel engines to natural gas, etc. • Promote conversion of existing gasoline engines to electricity, etc. • Promote conversion of existing gasoline engines to flex-fuel capability and mandate provision of alternative fuels subsidized by gasoline and Diesel taxes.	Comment noted. The RTP/SCS does not have purview over vehicle technology. However, as discussed in the Goods Movement section of the RTP, the planning for a zero-emission future includes the use of near-term alternative fuels and technologies as bridge to the long-term vision. For example, the SCAG Clean Cities Coalition is currently engaged in outreach activities for three projects that support and encourage the use natural gas as an alternative fuel. The Drayage- Natural Gas Truck Replacement Project involves the replacement of old, heavy-duty diesel drayage trucks with new trucks powered by clean natural gas engines, corresponding with the deployment of approximately 180 natural gas trucks. The Liquefied Natural Gas (LNG) - Corridor Expansion Project makes the final connection between the existing public access LNG fuel infrastructure in Southern California and the LNG fuel stations being developed in Utah, providing a 700-mile LNG fueling corridor along one of the nation's most heavily traveled goods movement truck routes between Southern California and Salt Lake City, Utah. And finally, the SANBAG/ Ryder Heavy Duty CNG Truck Replacement Project is funded with $19.2 million to deploy 262 natural gas trucks and construct two fueling stations. There are currently over 130 vehicles deployed, with fueling stations in development. Through Clean Cities, SCAG has shown a commitment to expand the use of a range of alternative fuels. In addition, SCAG is currently engaged in a collaborative process to prepare Southern California for the forecasted influx of Plug-In Electric Vehicles (PEV), which will reduce air pollution, address AB 32 and SB 375, and attract green businesses to Southern California. SCAG recognizes that a regional planning perspective is necessary to adequately address PEV Readiness. In order to better understand the on-going and planned efforts in the region, SCAG has coordinated stakeholder meetings with utilities, subregional councils of government, academia, jurisdictions and other key regional partners. SCAG has also

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				included PEV related actions and strategies in the Draft RTP/SCS that would support and expand this effort. In June 2011, SCAG, in conjunction with our regional partners applied for two PEV planning grants and was successful in both applications. The first grant, awarded by the U.S. Department of Energy (DOE) has as its primary purpose the development of a Regional PEV Readiness Plan for Southern California. The South Coast Air Quality Management District (SCAQMD) submitted the statewide application in partnership with SCAG, the Bay Area Air Quality Management District, the Plug-In Electric Vehicle Collaborative, and Clean Cities Coalitions in California. This grant awarded $1 million to PEV Readiness efforts statewide, with $300,000 going to SCAG. The second successful grant application was awarded by the California Energy Commission (CEC) and was the result of a collaborative effort between SCAG and SCAQMD in partnership with SCE, the Western Riverside Council of Governments (WRCOG), and South Bay Cities Council of Governments (SBCCOG). This grant has been funded for $200,000. The purpose of the project is to develop two complementary subregional plans in collaboration with WRCOG and SBCCOG. These subregional plans will serve as models for other subregions as they begin to develop their own PEV Readiness Plans. SCAG will continue to work with our regional partners on this new planning effort and will pursue outreach efforts to additional stakeholders as the process evolves.
233-08	Matt Korner		• Add non-highway bi-county connectors between San Bernardino and Riverside similar to the Gold Line between Los Angeles and Pasadena and develop the land accordingly; expand Metrolink between the two cities and add stations.	Comment noted.
233-09	Matt Korner		• Promote the Inland Empire as offering value in the form of a higher quality of life versus a lower cost of living, especially when that lifestyle is coming in a highly-desirable urban package with more square footage, features, and amenities than those found in the coastal counties.	Comment noted.
233-10	Matt Korner		• Increase the numbers of freeway-running express buses that connect to multimodal terminals in city centers and ensure reliability through concurrent use of congestion pricing/tolls.	Comment noted.
233-11	Matt Korner		• Pay particular attention to improving the guest experience at	Comment noted.

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			transit stations since the waits are often cited as the most onerous parts of public transportation.	
233-12	Matt Korner		• Increase the internal demand for Inland Empire airports by expanding the tourism industry in the region.	Comment noted.
233-13	Matt Korner		• Expedite high-speed rail development, especially on the L.A.-to-San Diego segment where the need is gr	Comment noted.
234-01	May Baki		We have heard of a proposed "Regional Transportation Plan" that is being developed by SCAG to create a system of truck-only lanes extending form the San Pedro Bay Ports to downtown Los Angeles via the I-710, connecting the east-west segment, and finally reaching the I-15 in San Bernardino County. We also heard of another project called the "GRID" designed to upgrade the port to a first class and efficient ships handling and cargo unloading center and also connects the Port to its distribution centers using an underground railroad system that has no second worldwide. The RTP project is projected to create an all trucks lane, but would still be unsafe due to its traffic, and environmentally unfriendly due to the concentrated number of trucks that will be running all day and night on its lanes. In contrary, the GRID project will change the container handling system in such a way that not only would put the entire freight infrastructure underground, but also provide zero-emission, zero noise pollution, zero light pollution, and free the land surface for other useful development. As residents of Southern California and Greater Los Angeles, we commend you for the improvements that your team is considering to improve our port and economy, and we respectfully ask you to consider the GRID project instead of the RTP.	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts. Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges. We agree that reducing emissions from freight activities is critical for the region. The 2012 RTP advances strategies for applying near-zero and zero-emission technologies to truck lanes and continues to evaluate advanced technology options for rail.
235-01	Michael Greer		We do NOT want any plan dictated by ICLEI or Agenda 21. We haven't asked for "sustainable communities" or trains or bike paths. We want our roads and freeways fixed and no money diverted to "sustainable" ANYTHING. There is NO Global Warming and NO reason to limit our energy.	Comment noted.
236-01	Miriam Strysik		710 Tunnel - NO - Increases truck traffic for port movement using outdated technology. FREIGHT IS THE WAY TO GO. In terms of savings in emissions, it is estimated that a total of ~60% reduction in CO2 emissions is achievable by a modal switch from road to rail. See Case Study "Development of a California Geospatial Intermodal Freight Transport Model with	Comment noted. SCAG recognizes the importance of addressing goods movement emissions concerns. Our research indicates that there are limited opportunities for freight modal shift strategies to facilitate significant emissions reductions given distinct modal market segmentations in goods movement. As such, our research focus to date has been the application of

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			Cargo Flow Analysis" - http://www.arb.ca.gov/research/apr/past/07-314.pdf	near-zero and zero-emission technologies for both rail and trucks serving the region.
237-01	Paul Coambs		Without delving into the exact specifics of the plan, the executive summary adequately demonstrates that SCAG plan is responding to federal and state requirements regarding emissions impacting “air quality.” As such, the SCAG plan falls right into line with the precepts of the U.N. Agenda 21 program. In short, the SCAG plan intends to begin a transition to force the population into high density urban cities and transportation corridors. With a goal of zero or near zero emissions, the eventual end-plan will not just diminish the use of automobiles for personal use, it will eliminate, for all practical purposes, the use of the internal combustion engine. SCAG is using a smoke screen approach to sell its programs. In addition to the emission requirements, SCAG attempts to justify forcing people to use “active transportation” for safety and health reasons. Yet, SCAG fails to propose adequate funding for bicycle safety. The state of health of individuals concerning obesity, etc, is alarming but it is not the business of a transportation system. Claiming that high density housing is a healthy plan is dishonest. Bicycling and walking is healthy, not living in the environment prescribed by the plan. The SCAG plans require the implementation of alternative energy systems, which are neither technologically nor fiscally available. The SCAG plan is not what we need with the current runaway government spending. The SCAG plan is a classic liberal boondoggle that requires a huge redistribution of wealth. SCAG is a natural extension of the federal and state buy-in to the U.N. agenda to extort money from the western world and in the process to hamstring the capitalistic engine that modernized much of the world. The ignorance of the western politic to join with the U.N. in this socialist movement and at the same time turn a blind eye to India, China and the third world nations is astounding. Dump the SCAG plan and tell both the feds and California to eliminate the unrealistic environmental requirements.	Comment noted.
238-01	Peter Orona		Today there is no 710 Surface Freeway Route, Valley Blvd.-Alhambra Connector Road, or 710 Tunnel; consequently, the risk emanating from such concepts are zero. To all Federal, State, County, and Local governments who profess accountability when maintaining modern commercial	Comment noted. Issues regarding feasibility, design, and location of tunnel portals are not addressed at the regional-level analysis of the RTP/SCS and would typically be discussed as part of project-level engineering and environmental studies that are developed by implementing agencies and not SCAG.

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			productivity, it is your duty to find a balance between an individual's right to exist, and urbanization. Anything short of this is a travesty to the democratic process, and an abatement of our humanity. As elected officials, it is your responsibility in making sure that our communities are not abused. Our communities are holding you accountable. As honorable civil servants of our communities, we respectfully request the following items be addressed rigorously, competently, and judiciously. 1. What would it take to construct the southern portal between the 60 Frwy (Pomona), and the 10 Frwy (San Bernardino)? Can Freeway Interchanges be configured? If yes, then would it be possible for the southern portal to begin just before the 10 Frwy. Can a tunnel be constructed to go underneath the San Bernardino Frwy?	
238-02	Peter Orona		5. How will the Valley Blvd.-Alhambra Ave. Connector Road (part of the Low-Multi- Build Alternatives) benefit El Sereno? Compare and contrast the efficiency and effectiveness between the Valley Blvd.-Alhambra Ave. Connector Road, a 710 Surface Freeway Route, and the 710 Tunnel. Provide all information on any and all environmental studies, or reports that have been done and completed near, and around the proposed 710 Tunnel. Indicate what efforts have been made to provide this information to the community of El Sereno. Provide any tangent plans that are being considered in conjunction to the 710 Tunnel in order to mitigate LA County traffic problems. For example, will a commuter train station be constructed in El Sereno between Alhambra Ave., and Valley Blvd.?	Comment noted. Issues and questions related to work being performed as part of the Environmental Impact Report/Environmental Impact Study should be directed to the lead agency, in this case, Caltrans.
238-03	Peter Orona		12. Can Caltrans buy/build two tunnel boring machines? Having the boring machines simultaneously working at both ends could cut tunnel construction time in half. Why can't the boring machines be designed, and built by Americans within the United States?	Comment noted. Issues and questions related to work being performed as part of the Environmental Impact Report/Environmental Impact Study should be directed to the lead agency, in this case, Caltrans.
238-04	Peter Orona		13. After tunnel construction and cost, how many years will it take to break even? When will Los Angeles County start making its profits?	Comment noted. Issues and questions related to work being performed as part of the Environmental Impact Report/Environmental Impact Study should be directed to the lead agency, in this case, Caltrans.
238-05	Peter Orona		18. How much will a toll road system cost to implement, and maintain?	Comment noted. The cost of operating a toll road is factored into the financial analysis and assessment of innovative project delivery options, including P3s (public private partnerships). Current analysis assumes that revenues generated from toll

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				facilities pay for the construction (including paying debt service associated with construction) as well as the operation and maintenance of those same facilities (this includes the cost of electronic toll collection systems). Toll facilities have the ability to attract private capital and participation in operating and maintaining the facility, reducing the burden on public sources of revenue and risks.
238-06	Peter Orona		19. Are current modes of production changing to prevent the harmful effects of pollution? Provide information that the Market Place will create alternative-affordable modes of transportation, and fuels by the time the 710 Tunnel is completed? For example, when will Fuel Cell Vehicles (FCV's) be readily available on a mass transit scale?	Comment noted. The California Air Resources Board has developed and approved Advanced Clean Car rules affecting gasoline- and diesel-fueled cars and zero-emission technologies. More information can be found at http://www.arb.ca.gov/msprog/clean_cars/clean_cars.htm.
238-07	Peter Orona		20. Will the 710 Tunnel engineers learn from all the errors that previous tunnel mishaps demonstrate? For example, people living around tunnel portals in Australia are suffering, and dying. The Big Dig in Boston is a fiasco. Will an independent panel of environmental experts review the 710 Tunnel EIR? Will a contact telephone number for all agencies, and government officials be provided to voice concerns and complaints during construction?	Comment noted. Issues and questions related to work being performed as part of the Environmental Impact Report/Environmental Impact Study or as part of any project construction activities should be directed to the lead agency, in this case, Caltrans.
238-08	Peter Orona		21. Logistically, would it be possible to evenly spread the amount of freight tonnage along the Pacific Rim harbors (San Diego, Long Beach, San Pedro, San Francisco, and Seattle). What would it take to ensure that a more efficient and effective On Time Delivery System be implemented? Would an upgraded of our national railway system help prevent unnecessary truck traffic through the counties of LA/Riverside/Ventura/ San Bernardino/San Luis Obispo, etc.? For example, can the coordination of freight goods that make their way towards the Midwest, or Northwest be dropped off at any of the northern bays rather than being distributed from the ports of Los Angeles or Long Beach?	Comment noted. In 2010, the Ports of LA and Long Beach handled cargo valued at approximately $336 billion. This trade resulted in major regional economic contributions in the form of jobs, business revenues, and taxes. Freight movement in the SCAG region serves as an important economic engine that must be maintained. While it might be possible for some cargo to be serviced at other west coast ports, the San Pedro Bay Ports offer significant advantages that attract containerized traffic from the Pacific Rim to the region including, but not limited to, deep-water ports and port equipment able to accommodate very large ships, an extensive highway network linked to the rest of the nation, two Class I railroads that service the Ports and the region, an abundance of warehousing and distribution centers, a considerable amount of transloading businesses, and a large internal market. An efficient and extensive rail network is critical to the goods movement system. However, it is not feasible to move all goods by rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be

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				able to use rail from the San Pedro Bay Ports to their final destination. Goods moving from the Ports to local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.
238-09	Peter Orona		22. Are the 710 Tunnel scrubber towers, and emergency exits going to be equidistant from each other? Indicate tower and exit locations. Can tower and exit locations be situated where there are no existing domiciles? If a scrubber tower is warranted in a residential neighborhood, can a four-block radius of green space circumscribe the scrubber tower?	Comment noted. Issues regarding feasibility, design, and location of tunnels are not addressed at the regional-level analysis of the RTP/SCS and would typically be discussed as part of project-level engineering and environmental studies that are developed by implementing agencies and not SCAG.
238-10	Peter Orona		23. How many people concerned about the 710 Tunnel have read ADVICE & PLANNING by Martin H. Krieger?	Comment noted.
238-11	Peter Orona		[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 61.
239-01	Phillip Brown		Rather than overly focused, commuter driven centralizing of trips via expensive rail more planning and building should be made to provide for increased population density and job creation to reduce travel and commuting with shorter trips; think “Centers Concept” in sub-regional aggregations. In that manner extensive low cost medium capacity transportation and land use in patterns and corridors will provide a much more Southern California like growth and compatibility with what exists. The specific overall comment to be made is that SCAG needs to include the Flow Boulevard concept in its planning vision formation, criteria and plan recommendations for the Regional Transportation Plan. It may be better said that SCAG being the lead agency should see that County agencies like the Los Angeles County Metropolitan Transportation Authority be directed to enlarge its forms of transportation improvement to include well crafted land use and transportation improvement forms such as the Flow Boulevard technique.	Comment noted. SCAG will continue to work with its county partners in considering innovative solutions to our region's transportation challenges.
240-01	Randy Strapazon		I am a resident of La Canada Flintridge and will be impacted by the closure of the 710 gap connecting to the 210 freeway. There is a reason that the debate about the benefits of closing that gap has been ongoing for more than thirty years. It is not a good idea! We need people looking to the future, not to the past, for	Comment noted. SCAG recognizes that a project specific environmental analysis is underway. Upon the completion of that effort and selection of a preferred alternative by Metro, SCAG will work with Metro to amend the RTP as necessary to update the project description and associated modeling

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			traffic and congestion relief solutions. Building a tunnel will only increase the number of vehicles passing through this section. If your agency is concerned with environmental impact and the reduction of greenhouse gasses, increasing the number of vehicles on the road is shortsighted. Please look to more long range and reasonable solutions, not the ones "your fathers" might have chosen. Thank you, Randy Strapazon	analysis.
241-01	Richard Risemberg		Having read multiple synopses of SCAG's Regional Transportation Plan, I am stunned to discover that the RTP suffers from both a lack of, and an excess of, imagination. The lack of imagination is exemplified by the plan's reliance (despite a few bones thrown to transit and non-motorized transportation) on still more lane-miles for still more cars and trucks. This is a paradigm that has consistently failed us for over half a century, since traffic engineers first figured out that building ever more roads induces ever more traffic and creates ever denser congestion. The excess of imagination is exemplified in the evident belief that simply enacting practices that have failed again and again for two generations will somehow magically "work" this time.	Comment noted.
241-02	Richard Risemberg		Considering how best practices are evolving in other US regions and worldwide, it is actually shocking that SCAG is not dedicating its energies to nurturing the non-fossil-fueled and non-motorized transport modes that are becoming the new paradigm worldwide.	Comment noted.
241-03	Richard Risemberg		Bicycling, walking, and both light and heavy rail passenger transport have been proven not only to reduce congestion, but also to improve public health and happiness and increase economic activity, as people trade sitting in massive traffic jams, or speeding down surface streets looking in vain for free parking, into actually participating in the casual public discourses of civic life--which include being able to browse commercial streets from the seat of a bicycle, or on foot after descending from the tram, unfrustrated by the parking struggle.	Comment noted.
241-04	Richard Risemberg		And freight movement in our region is a nightmare, primarily because it is so dependent on trucks, whose energy efficiency is one-quarter that of a diesel train, and whose spatial needs are orders of magnitude higher than those of railroad operations. This absurd obsession with truck freight results in thousands of acres of precious land being taken off the market, and the tax	Comment noted. Local, regional, and state partners, including experts and stakeholders from both the public and private sectors, have worked closely together over many years to identify and implement potential solutions to the challenges resulting from freight movement in Southern California. These efforts have included the consideration of numerous concepts.

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			rolls, to support a dirty, cumbersome, and fundamentally antiquated method of moving freight between ships and railcars. Wasting thousands of acres of port property to stack containers by onesies onto trucks, simply to haul them forty miles and put them on the train they are destined for anyway, is, frankly, ridiculous. I am familiar with the GRID project that has been making waves lately, and its "Superdock" is a far superior way of moving import and export goods bewteen ships and trains. Furthermore, GRID's proposed underground electric rail shuttle to the Downtown and Inland Empire railyards promises not only to reduce the devastation diesel trucks and even trains are wreaking on populations adjacent to the 701 corridor, but also to save the region millions from freeway and street expansions that would become unnecessary! This is a concept both visionary and practical, and represents the sort of thinking we need from SCAG--not habitual reiterations of outmoded practices that will only drown us in concrete, smog, and traffic chaos.	Research and analysis to date have indicated that a regional truck-lane system used by clean trucks (i.e., near-zero and zero-emission) offers a promising solution to regional freight concerns. Nevertheless, SCAG anticipates further analysis of alignment concepts including evaluation of a wide range of technology options for application to such a system. Along with technology options, evaluation would be made about adequately addressing market segmentation, first-mile/last-mile issues, operational feasibility, collaboration with regional stakeholders (such as the San Pedro Bay Ports), and costs among others. SCAG will continue ongoing dialogue with stakeholders and transportation interests to to identify potential solutions to regional freight challenges.
242-01	Robert Rigdon		I am concerned that the Farmers Field NFL stadium in downtown Los Angeles will block cross-town traffic in all directions.	Comment noted. Projects such as Farmers Field must undergo a project-level environmental impact report (EIR), as required by California law, to identify impact such as traffic impacts, and to identify mitigation measures. An EIR for Farmers Field is currently under development.
243-01	Rodney Spooner		Does the finance plan include bonds or loans, and are they going to be voted on by taxpayers? How many would be permanent versus temporary and how many would be government versus private? I hope that the jobs industry are American jobs and I hope that would be a requirement of this whole project is that everything will be American.	Comment noted. The Transportation Finance Appendix provides detailed explanation on all revenue sources included in the RTP. The financial plan includes bonding against existing local option sales tax measures and bonds for the acceleration of toll facilities where the tolls collected would pay back the bonds. Steps for issuing the bonds are dictated by the applicable requirements of each measure, toll facility covenants, and debt policies established by the issuing entity. A number of projects in the region are seeking or have recently been awarded low cost loans from the federal government under the TIFIA program. Since SCAG is not an implementing agency, we do not issue bonds nor seek loans for project implementation. We encourage the participation of the private sector when it can result in efficiencies and in turn, savings to the taxpayer. Since most of the direct jobs associated with the RTP are either construction or related to the operation and maintenance of the transportation system, they are generally by necessity local

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				jobs.
244-01	Rose Gonzales		Riverside County	Comment noted.
245-01	Stephanie Johnson		Thank you for the opportunity to comment on the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. The Plan states as its goal "improving the quality of life for our residents". The 2012 RTP/SCS will transform the region, serving as a blueprint for improving quality of life for our residents by providing more choices for where they will live, work, and play, and how they will move around. The 2012 RTP/SCS proposes investing over $500 billion over the next 25 years to improve the quality of life of the region's residents by enhancing our transportation system. While I agree that improving the quality of life for the residents is an admirable goal, the Plan as indicated by the SCS City maps, will denigrate the quality of life for the residents of San Marino. My comments regarding the 2012-2035 RTP are limited to where I live, Los Robles Avenue in San Marino, and the adjacent area.	Comment noted.
245-02	Stephanie Johnson		While reviewing the Resources > SCS Map Tool from the SCAG web site, http://rtpscs.scag.ca.gov/Pages/SCS-Maps-Tool.aspx, I was shocked to discover that Los Robles Avenue in San Marino has been designated a High Quality Transit Corridor. The SCAG RTP Plan indicates that: A HQTA (High Quality Transit Area) is generally a walkable transit village, consistent with the adopted SCS that has a minimum density of 20 dwelling units per acre and is within a ½ mile of a well serviced transit stop, and includes transit corridors with minimum 15 minutes or less service frequency during peak commute hours. Los Robles Avenue in San Marino is a 7/8 of a mile, two lane narrow street fronted exclusively by single family homes where children live and play. The homes, built between 1920 and 1950, and the set back is close to the street. The posted speed limit is 30 mph. the posted weight limit is three tons, and truck traffic is prohibited. The City of San Marino General Plan, classifies Los Robles Avenue as a residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street. There is no bus service. How then, was Los Robles Avenue in San Marino designated a HQTC? I posed this question to both the City of San Marino staff and City Council. They were unaware of this designation in the proposed RTP Plan. I also made inquiries of SCAG staff and was	Comment noted. Los Robles Avenue in the City of San Marino is not designated a High Quality Transit Area (HQTA) within the 2012 RTP / SCS. There is no current or planned bus or other transit service to establish an HQTA designation within that corridor. There appears to be an error with the map tool available on the website referenced here, which will be corrected.

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			told that the Map for San Marino was incorrect with regard to bus stops, because no bus route is planned for the street.	
245-03	Stephanie Johnson		Below are copies of the SCAG SCS Maps for San Marino, Alhambra, South Pasadena and Pasadena. It is not clear why certain streets have been designated HQTC and others have not. SCAG Map for San Marino – High Quality Transit Corridors (HQTC) This map indicates that Los Robles is a HQTC with bus stops. South Pasadena Note that although Fremont Avenue is designated a HQTC in Alhambra, it is not in South Pasadena, although the street merges into S. Pasadena Avenue that is the freeway entrance to the 210 and 134 freeways in Pasadena. Garfield Avenue has a METRO bus route that extends through South Pasadena that stops at the Gold Line Mission Street station. Alhambra Why is Garfield Avenue not designated a HQTC? It is a major arterial in Alhambra and has a bus routes that extends through South Pasadena that stops at the Gold Line Mission Street station. Pasadena Note that both Los Robles Avenue and Oak Knoll Avenue in Pasadena, south of California Boulevard, are single family residential areas. Alhambra, South Pasadena, San Marino, Pasadena Fremont marked in purple for reference purposes. If regional planning is to be based upon the SCS maps, then further information regarding how the HQTC attribute was assigned to streets must be made public. Los Robles Avenue in San Marino does not meet the definition of an HQTC. Regional traffic should not be directed toward the street, exacerbating the existing cut through traffic and its resulting negative impacts upon the residents.	Comment noted. California Public Resources Code Section 21155 defines a “high quality transit corridor” (HQTC) as one having fixed route bus service with service intervals no longer than 15 minutes during peak commute hours, or, as per California Public Resources Code Section 21064.3, a “major transit stop” is a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon commute periods. SCAG has a statutory mandate to follow these definitions. Los Robles Avenue is the City of San Marino is not designated a High Quality Transit area within the context of the 2012 RTP / SCS. There is no current or planned bus or other transit service to establish an HQTA within that corridor. There appears to be an error with the map tool available on the website referenced here, which will be corrected. South of Commonwealth Avenue, Fremont Ave within the City of Alhambra is served by two Metro Bus routes, route 258 and route 485, whose combined peak commute period headways meet the statutory definition of SB 375. Route 258 leaves Fremont Avenue at Commonwealth avenue, and the service of route 485 is not sufficient in peak commute periods to trigger an HQTA designation. Montebello Bus Lines Route 30, which operates along Garfield Avenue in the City of Alhambra, has 40 minute peak commute period headways, and does not meet the statutory definition of a HQTA. It is so noted that Los Robles Avenue and Oak Knoll Avenue in the City of Pasadena are single family residential areas.
246-01	Stephen Shapiro		I don't want money diverted from fixing our EXISTING infrastructure to "sustainable" anything. There is NO Global Warming and no reason to ration our energy.	Comment noted.
247-01	Susan Sulsky		I oppose all items in the draft RTP that recommend the expansion or extension of highways, for the following reasons: The fundamental law of highway congestion (Anthony Downs, 1962, 2004, 1992; and confirmed most recently by Gilles Duranton and Matthew Turner of the University of Toronto) states that the travel speed of an expanded highway reverts to its previous level before the capacity expansion and that the	Comment noted. Increase in total VMT in 2035 over the current condition is primarily due to estimated increase of 4 million people over the plan period. However, VMT on a per capita basis will actually decrease over this period once the plan is fully implemented. While the Plan does include some needed highway improvements, including the SR-710 Transportation Improvement Options project, there is no evidence that these

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			extension of interstate highways is met with a proportional increase in traffic in the U.S. SCAG's assumption that highway expansion reduces congestion and improves pollution levels is grossly inaccurate. The traffic modeling fails to fully account for generated and induced traffic. And therefore exaggerates the benefits of expansion and the does not reflect the severity of future congestion problems. The draft RTP anticipates adding 948 centerline miles and 7419 lanes miles which would be a 4.4% and 11.1% increase respectively. The SCAG RTP will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks throughout the Southern California region.	improvements would contribute to the total VMT increase in any discernible way. The 2012 RTP identifies a multi-modal strategy that incorporates transit, highway, and active transportation strategies as well as demand management and congestion pricing strategies to achieve overall improved system performance and reduction in GHG targets required under SB 375.
247-02	Susan Sulsky		I oppose the 710 gap closure project as it is un-defined and is not eligible to be on the Constrained Plan. The proposed SR-710 Extension Toll Tunnels, at $5.6 BILLION already underfunded by at least 50%, must be moved from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law for inclusion in the Constrained Plan. There is enormous internal inconsistency with the SCAG's six possible construction zones yet all actual estimates based only the previously defined Meridian Route alignment.	Comment noted. SCAG's 2012 RTP is consistent with fiscal constraint requirements set forth under applicable federal regulations and guidance, including the requirement that strategies for ensuring availability of new funding sources be identified. See 23 CFR 450.322(f) (1). "Fiscal constraint" means, in part, that the RTP includes sufficient financial information for demonstrating that projects in the RTP can be implemented using committed, available, or reasonably available revenue sources. See 23 CFR 450.104. The SR-710 project is proposed to be funded by both core (Measure R) and new, reasonably available revenues. SCAG documented that the new funding sources identified for the SR-710 project are reasonably available. As such, strategies delineating required implementation steps for ensuring the availability of proposed new revenues are discussed in the Transportation Finance Appendix.
247-03	Susan Sulsky		I oppose plan items in the draft RTP that recommend increased conventional roadway and rail yard capacity for goods movement. The RTP should instead include existing zero-emission goods movement alternatives. Goods movement must be accomplished via electrified freight rail not trucks. Goods movement proposals in the draft RTP are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan. The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor	Comment noted. Emissions from goods movement activities are a significant concern for the SCAG region. The regional truck-lane system identified in the 2012 RTP is envisioned to be a facility used by zero emission trucks. The 2012 RTP includes an Environmental Action Plan that will lead to the deployment of zero emission technologies in the timeframe necessary to meet federal requirements. It is not feasible to move all goods by rail, whether electrified or conventional rail, as existing modal segments generally serve different markets. For example, goods moving to distant areas outside the region (e.g., Chicago, Dallas) may be able to use rail from the San Pedro Bay Ports to their final destination. However, goods moving from the Ports to

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			air quality (p. 68) and negative impacts in neighboring communities and throughout the region. However, the plan allocates billions of dollars to expanding conventional goods movement, saying "truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety.and provide a platform for the introduction and adoption of zero-emission technologies." Yet the plan does not require zero-emission technology.	local warehouses, regional manufacturers to local stores, or across the international border with Mexico may not be able to utilize rail as a result of cost, lack of accessibility, increased travel time, first-mile/last-mile issues, or many other factors. The goods movement system is complex and cannot effectively rely on a single mode of transportation.
247-04	Susan Sulsky		[PEIR comment(s)]	See the Final PEIR Addendum Section 4.0, Responses to Comments on the Draft RTP PEIR, Letter Number 89.
248-01	Theresa Sherrin		I'm also a native Californian and also had a business in Orange County. This is going to ruin the businesses. It's not going to help us. It's going to cost us a lot of money. I just think that this is the wrong way to go. The Government is trying to take everything we have away from us and I think they are interfering with what we should have and have more open space. This is part of agenda 21. They are trying to take us over. We need to wake up to that and I don't think the people in this community want it. I want to make sure that we don't waste money. If we are going to spend money on some kind of a program, I just don't want to waste money. Like we build a transit system and it's not conducive here in Orange County or it doesn't get used or it has to be subsidized so much by the Government. I don't want us to make that mistake because Southern California is not like Northern California. We don't live that way. We don't live where a transit system works. That's our lifestyle. Who has the right to dictate what our lifestyle should be, but we can't afford to waste anymore taxpayer money. So I don't care if funding comes from the Federal Government, or where the funding comes from. We can't afford to have infrastructure that's going to go blank. That's going to sit there and start to be urban decay.	Comment noted. The RTP/SCS was developed through a collaborative bottom-up process with extensive input from residents, stakeholders, local entities, including cities, counties, and county transportation commissions.
249-01	Anonymous		In this very difficult economy, how will such a proposed plan be funded? Will there be a tax increase to fund this project?	Comment noted. We recognize that the SCAG region, California, and the nation continue to slowly recover from the Great Recession. However, the RTP spans a time horizon that stretches to 2035. There will likely be a number of different economic cycles over the course of those 20-plus years just as economic conditions have varied substantially over the last 20 years. The Transportation Finance Appendix provides a detailed explanation on all revenue sources included in the RTP,

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				including potential tax increases. We recognize that the future cannot be known with certainty and therefore we make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding option, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate.
250-01	Anonymous		For those of us who believe that the US is in an economic crisis, no increase in tax, be it excise of other, is acceptable.	Comment noted. We recognize that the SCAG region, California, and the nation continue to slowly recover from the Great Recession. However, the RTP spans a time horizon that stretches to 2035. There will likely be a number of different economic cycles over the course of those 20 plus years just as economic conditions have varied substantially over the last 20 years. The Transportation Finance Appendix provides a detailed explanation on all revenue sources included in the RTP, including potential tax increases. We recognize that the future cannot be known with certainty and therefore we make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into the future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate.
251-01	Anonymous		You're planning for growth which SCAG was originally designed to do, to plan for regional growth but you have actually planned for shrinkage because the only way that this type of transit system would work is to pack us into the cities because all of what you're talking about is for dense mixed-use communities as opposed to the way that we like to live; in our suburbs, in our homes. I'd like to find out what changed you from a "planning for what people want" to "planning for what government officials think we need".	Comment noted.
252-01	Anonymous		Let me make another comment because that's not going to be the truth because what is being imposed on us is sustainable communities and one of them being proposed right here in Camarillo is to take out part of our meal in our center of our city as they did in Thousand Oaks with the Thousand Oaks Blvd. specific plan. We are not LA County and everything that I saw in that film was geared towards LA County and a lot of it was done	Comment noted.

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			to emotionalize us into accepting this.	
253-01	Anonymous		In the last 30 months, VCTC has received about $180 million from the federal government. I think that they're staff there is about 15 people and of that $180 million, 27% was spent on planning and I'm just wondering where all of that money is going and why are you planning our future? Why isn't it just being dictated by the free market what our needs are and why are they regulating and taxing the land here and ruining the ranchers and farmers so that they have to sell their land or it's taken back by the city. On Thousand Oaks Blvd in a 3 mile long span where they're putting in a specific plan, 62 businesses have gone bankrupt and the city has taken back the land. Where are we getting all of the land to do all of these projects?	Comment noted.
254-01	Anonymous		What you're proposing to do is to try and get people on trains. The trains are empty. I've lived here since 1960 and since 1960 I've never seen a quarter-filled train car. Not once. Secondly, you're trying to get people on bikes. Most people cannot ride bikes but most have health reasons. Most of the people in this community have doctor's appointments because many are elderly. How do you propose to get those people to their doctors' appointments regularly? It's just not a reality because this is not LA. You go to LA and do it but don't take our freedoms away and don't crowd people into an area and take our rights of driving or anything else away.	Comment noted.
255-01	Anonymous		You said that the RC will vote on April 4th. Is that the 6 Counties or will only Ventura County vote independently?	Comment noted. The Regional Council, which comprises members from all six counties including Ventura, will vote as a single body.
256-01	Anonymous		Will our elected officials from our County really make a difference in their vote?	Comment noted. The elected officials from Ventura County – and the other five counties within the SCAG region – who represent the cities and counties on the Regional Council and on the Policy Committees provide direction and guidance to SCAG staff in the development of all policies. By the time a plan or program is presented to the Regional Council for its approval, the Regional Council and Policy Committee members, which include representatives from Ventura County, have had many opportunities to provide their input and request any appropriate revisions.
257-01	Anonymous		Last question, at the end of this session today, how are you going to determine what the outcome is? Is there a vote? How are you going to report on the conclusion of this meeting?	Comment noted. All formal comments received will be responded to and presented to SCAG policymakers to be considered as part of the final RTP/SCS.

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258-01	Anonymous		When I voted for my elected officials, I did not know that I was giving them domain to make decisions over my future and the future of my children and my grandchildren without me having a vote. I'd like to know why none of this organizational planning has come up for a vote of any of the constituents. It seems to me like it's already drawn up, people have made up their minds and the 84 blessed ones are going to decide how the rest of us are going to live. I don't approve of that.	Comment noted. The RTP/SCS was developed utilizing a public bottom-up, multi-year process involving stakeholders and interested parties from across the region. Many of the RTP/SCS's most fundamental assumptions, including its growth forecast and anticipated future land use development patterns, were developed with input from local jurisdictions. Its core projects include long-range transportation plans developed by county transportation commissions and directed by voter-approved sales tax measures. Finally, RTP/SCS workshops and hearings were also held as the draft RTP/SCS was being developed in order to solicit input for the draft RTP/SCS.
259-01	Anonymous		Do you know of any situation in the entire US where rail-passenger traffic has broken even if it would not have been supported by the government?	Comment noted.
260-01	Anonymous		If the rails aren't breaking even and the buses aren't breaking even, then what's the model for all of the stuff that you have? Is it Europe? They're not breaking even either. That's just obvious to us what's going on here and we have our eyes on you.	Comment noted.
261-01	Anonymous		I'd like to pass around these pictures that I took last summer in Seoul, Korea and this is the way that you would like us to live. I'd like for everyone to take a look at how their housing is. There were 600 – 800 square feet for each apartment that was covered with a quick train that went from the airport to downtown Seoul. All of those people that got crammed into those houses didn't have a say either or they will not be there.	Comment noted.
262-01	Anonymous		Your interpretation of the construction of all of this is that all limited to union construction or construction people like my son who is non-union. Are those jobs going to be open for them?	Comment noted. The RTP/SCS has no purview over the construction of projects included in the RTP/SCS.
263-01	Anonymous		If there are 84 officials from 197 jurisdictions represents less than 50% representation amongst those jurisdictions and that doesn't seem sufficient to me. Secondly, you just mentioned where the derivation of the statistics came from on population increases which is all well and good except that the crucial part that is missing is demographic changes over time which are going to involve aging populations or that half the people will be over 50 by 2035. That really should factor into the idea of bicycling, etc.	Comment noted.
264-01	Anonymous		I've attended a couple of other meetings that were like this through my educational entity that I'm affiliated with and I can	Comment noted. SCAG works cooperatively with the other major Metropolitan Planning Organizations in the state and the

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			say that they cite these statistics and often they don't tell you where they came from and that's my question. Where are the statistics coming from pertaining to the carbon dioxide emissions? One of the things that you told us is that people have changed what they want in their lifestyles, young people are getting married and having children no longer want to live in the suburbs and no longer want to have their own single family homes and they actually prefer to live in these denser transportation hubs. The only study that I've ever been able to get anyone to admit that they've derived this information from was a Calbert Hoi Study. It is very important if you want to project your plans with citizen involvement and be open and fully transparent that these kinds of presentations should have your derivation of your statistics that are much more detailed.	California Air Resources Board (CARB) in addressing the requirements of SB375 with respect to greenhouse gas emissions and target setting. More information is available from CARB on their website: www.arb.ca.gov/cc/sb375/sb375.htm.
265-01	Anonymous		I've noticed that this meeting is in the afternoon on a workday and it's the only one for this county and then you move on to the next county. That's really not enough time to hear from the population that you're serving. It's very unfair and wrong.	Comment noted. While SCAG provides many opportunities for the public to learn about and comment on its various programs, plans, services and initiatives, including holding workshops and public hearings in various locations throughout the region at various times, SCAG realizes that not all times and locations will be convenient for everyone. SCAG will consider holding more public meetings in the evenings as part of its post-RTP/SCS assessment of outreach activities.
266-01	Anonymous		It strikes me as wrong that your 84 representatives of the population represent 18 million people. If that's the way that it goes then that should also be transparent so that we know where these people stand, what they're planning and that they're speaking for us. You may have the best intentions in the world but we still live in a free country.	Comment noted. SCAG's Regional Council and Policy Committee Members are elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. The cities and counties appoint the elected official to represent them at SCAG's Regional Council and Policy Committees. SCAG's Regional Council and Policy Committee meetings are open to the public and publicly noticed. SCAG Regional Council meetings are available via live streaming on SCAG's website, www.scag.ca.gov, and subsequent on-demand viewing online. The names of the Regional Council and Policy Committee Members are posted on SCAG's website.
267-01	Anonymous		Can you please provide a list of the 84 people on the RC. Their positions and maybe their contact information.	Comment noted. The roster of Regional Council members can be found on SCAG's website at http://scag.ca.gov.
268-01	Anonymous		We keep hearing about all of the problems on the road and the air quality and the truth is that the air quality is getting better and we have more cars on the road. Secondly, I'd like to reiterate on the handicap people and elderly people. This wonderful congestion that you have is going to involve great	Comment noted. SCAG's RTP/SCS addresses the transportation needs of the elderly and disabled. SCAG encourages bringing all sidewalks in the region up to ADA standards. In addition, the Safety Appendix has recommendations applicable to elderly drivers (Challenge Area 9) to both help older drivers maintain

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			difficulties for the freedom of our elderly people and their inabilities to get into cars which equates to freedom.	their driving skills as well as providing transportation options to help maintain mobility for senior citizens no longer able to drive.
269-01	Anonymous		Never before have the crucial linkages between the economy and transportation system and land use been as important as now. That is an assertion and its telling me that a group of people got together and decided what would be good for this area of California and decided that they would implement this without any risk to themselves because they have full taxpayer backing and they are able to do through eminent domain confiscate property if the people don't agree to their plans. Through these financial statements that have additional taxes and a lovely thing called mileage user fees. My question is, how are those calculated and how will they be? On your website there is a significant source for funding and it ends up being somewhere along the lines of $110 billion from innovative financing and new revenue sources but for the first 2 time periods there's zero so out of 3 time periods it gets us to $110 billion dollars. Out of the 3 categories, the only one bigger is the sales tax. Can you explain to me how those mileage based user fees are calculated?	Comment noted. The Transportation Finance Appendix provides detailed explanation on all revenue sources included in the RTP. The potential implementation of the mileage-based user fee is not assumed to start until 2025. It is also assumed to replace the existing state and federal gas excise tax. The proposed mileage-based user fee, like the existing state and federal gas excise tax, is directly linked the amount of transportation resource used. While the mileage-based user fee would charge drivers for each mile traveled, the existing gas excise taxes charge drivers for each gallon consumed. The amount of gallons of gas consumed is a direct product of the total number of miles traveled.
270-01	Anonymous		What troubles me is that there are 84 people in this county who are so involved that they don't understand or accept the fact that the green agenda is a complete fraud. That there's no global warming and that man isn't creating it. It would be insignificant and even Phil Jones in the IPCC admits that over the last few years there has been insignificant increase in temperature and yet you want to reduce CO2 emissions which is what we breath. The only reason you'd like to control CO2 is to control our lives.	Comment noted. The greenhouse gas emission reductions that SCAG is required to meet via the 2012-2035 RTP/SCS is a state requirement as a result of Senate Bill 375.
271-01	Anonymous		I heard the President of Mercedes Benz speak on the future of the automobile and he said that the automatic self-controlled automobile is the thing of the future and that you can call up your car and will pick you up and drive you to your dentist and will return you to your home and is within 15 to 20 years out. Google has an automobile that is driven 144,000 miles without an accident and has been tested and is a perfectly practical system. It's the future of automobiles. Why do you go back to a train which is a 19th century invention and try to force us into ancient technology. Why don't you have foresight and look into	Comment noted. The 2012-2035 RTP/SCS is a multimodal plan that recognizes the importance of our region's highway and arterial system, and includes investments to both maintain and improve this system. Such a system would be able to serve smarter vehicles as they are further developed and introduced into the market.

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			the future of the automobile and make our infrastructure that we have now twice as productive.	
272-01	Anonymous		Why do you want to include the trains before there's a need? Why not let the free market work? You show pictures of Ventura highway from Ventura to Santa Barbara that are 4 years old. It no longer looks that way. Why are you seeking us? Why should we pay for this if we don't want them?	Comment noted.
273-01	Anonymous		When the 84 czars vote, is that good for the region? Now our towns, cities and counties are going to become regions so will we be ruled by regions?	Comment noted. SCAG's Regional Council and Policy Committee Members are elected Mayors, City Council Members and County Supervisors from jurisdictions throughout the SCAG region. The cities and counties appoint the elected officials to represent them at SCAG's Regional Council and Policy Committees.
274-01	Anonymous		All the money is there then? The gathering of our tax money is there.	Comment noted.
275-01	Anonymous		With these trains that you're talking about that are coming in full, when they get to the station in Los Angeles, I'm assuming that everyone works within a block away from where the station is or do they and do they not have to take some other form of car, taxi or bicycle?	Comment noted. A majority of train riders transfer to the subway upon arrival to L.A. Union Station.
276-01	Anonymous		You are saying that the expansion of the train system costs so many billions of dollars. Instead of spending that money on the trains buy these people cars or give them taxi fare. Here's a comment on bicycle lanes. In Ventura County, very few people use bikes for serious transportation and you can't go to the market so if people use this for pleasure and today I drove from Carmen Drive to the library and there was a biker on the bike lane and I didn't think that he was riding very steadily. I went around him and how often do we read in the newspaper about a bicyclist who's killed while riding on the road. Bike riding is dangerous. I don't see spending money on more bike lanes. Also, the bike lane is not more than 2 feet wide and it's not enough.	Comment noted.
277-01	Anonymous		Why can't you put bike lanes on the sidewalk? Truthfully, hardly anyone uses sidewalks.	Comment noted. Many local jurisdictions prohibit bicycle riding on sidewalks due to safety concerns.
278-01	Anonymous		There's already that's been tried and tested in England and it's a solar car and the gas companies bought it up because it ran on sunshine. This happened in the late 70's or early 80's and it was a wonderful machine and although the patent has been bought	Comment noted. We recognize that the future cannot be known with certainty and therefore we make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well-documented in

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			it is possible in the future that this can be produced and available for us here. So a gasoline tax would no longer be available to the government and that might really put a kink in your plans. There are batteries that go for 100 miles without recharging and much of this is being held back by vested interests. We're being nailed to the wall by a government agenda that's going to tax us and use a chunk of fictitious pie in the sky in the future to grab our money today and push us into a place that none of us want to live.	the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate.
279-01	Anonymous		When Naresh was starting off with his presentation he was talking about bond funding for some of this project. What portion of the overall costs for all of this involves bond funding?	Comment noted. Debt service on bonds financing previously issued and anticipated to be issued throughout the planning horizon of the RTP accounts for 8.6 percent of the total plan cost.
280-01	Anonymous		I think that overall planning is very important and this is a great function that must be done. The problem that I see with this whole thing is that you are embarking on a very expensive proposition here. You have a shrinking tax base on a federal basis half the people in the country don't even pay taxes which leaves the rest for the middle class to cover. Here in California, I read last week that in 2008 and 2009 roughly one-third of the top two percent of tax payers are what's at stake. I see our tax base shrinking and the lady across the room who commented on the aging population, I think that the tax base is shrinking and what we're going to end up is that you'll find middle class taxpayers will not be able to afford to live in the state and they're going to leave and the 4 million people that you're talking about growing in our region will be illegals. The rest of us will be gone. You'll have 6 million people come in as illegals and the rest of us will be gone. At that point, when you dismiss us, you don't go into a major expansion program when you're on your knees and you're about ready to choke. That's the time that you go back and get yourself healthy again. This economy is on its knees in California and the economy nationally is on its knees. I don't think that the time to start this is now and then we'll all be for it.	Comment noted. We recognize that the future cannot be known with certainty and therefore we make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate.
281-01	Anonymous		I'd like to let you know that I have ridden on the Red Line and it is very busy. The Orange Line is also very busy and I had to stand in it which I didn't mind at the time as I was going to downtown LA and on a separate occasion I had to go into downtown LA in my car and had to park at a parking structure and it cost me	Comment noted. The RTP is fiscally constrained, meaning that there is sufficient financial information for demonstrating that projects in the plan can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported

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			about $20 to park. The gentlemen who suggested that people should abandon the rail and alternative modes of transportation and everyone should have a car well when your population is swelling and your land is not increasing with the population you need to come up with a creative solution and everyone can't be driving in a car because there's just no room. If you've ever been on the 101 and 405 exchange then you know that it's the second most congested freeway interchange in the country and possibly would rank high in the world. My question is that the sustainable communities that started under the Obama administration that partnered the targeted transportation, the EPA and HUD. I read recently that because of the lack of funding that communities were getting funding to improve their sustainable aspects such as mobility that they are not going to be doing this anymore until the economy can improve. How do you think that this will affect the long-term plan?	transportation system is being adequately operated and maintained. We also recognize that the future cannot be known with certainty and we therefore made reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and documented in the RTP to ensure transparency. As we gain more insight into the future and the reasonableness of our assumptions, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
282-01	Anonymous		The lady in the back mentioned that she had difficulty in getting to a location like downtown. To answer her question, back in the 70's there was something called carpooling. It can still be done today. If you go on the freeway today, you can see that 90 percent of the vehicles have one person. I realize that if you're in business for yourself or a private contractor then you're going from one site to another you're not going to ride with someone else on the freeway but many people are going to the same location and if they chose and still keep their freedom. For those that are challenged financially or otherwise, you can still carpool. Maybe the state or county should develop a sophisticated carpool program for its substituents that maybe would assist the freeway congestion problem that you're concerned about.	Comment noted. There is an existing ridesharing program in Southern California, operated by the county transportation commissions in Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. Visit www.commutesmart.info.
283-01	Anonymous		Do you have a cost/benefit analysis? Was that done with this plan and if so, how detailed or how specific is it and where's the money going?	Comment noted. A benefit-cost analysis was prepared for the RTP. The investments in the RTP provide a return of $2.90 for every dollar invested. Plan expenditures are detailed through the RTP and appendices and are summarized in Chapter 3, Financial Plan. You might also be interested in the analysis of the economic impacts of the RTP, which is provided in the Economic and Job Creation Appendix of the final RTP/SCS.
284-01	Anonymous		Was there an inflation rate that was built into the projections that you're making going out to 2035?	Comment noted. SCAG used 2.9-percent inflation rate to adjust constant dollar revenue forecasts into nominal (year of expenditure) dollars based on the historical inflation trends

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				measured by the Gross Domestic Product (GDP) Price Deflator—an approach consistent with the one used by the Federal Office of Management and Budget in preparing the Budget of the United States Government. The financial plan uses a 3.2-percent annual inflation factor to estimate future, nominal costs for capital expenditures based on the 30-year historical inflation trends measured the by Caltrans' highway construction cost index. The faster increase in construction costs than in revenues contributes to a decline in purchasing power for transportation funding over the RTP planning period.
285-01	Anonymous		What are we using for historical inflation rates?	Comment noted. SCAG used 2.9-percent inflation rate to adjust constant dollar revenue forecasts into nominal (year of expenditure) dollars based on the historical inflation trends measured by the Gross Domestic Product (GDP) Price Deflator—an approach consistent with the one used by the Federal Office of Management and Budget in preparing the Budget of the United States Government. The financial plan uses a 3.2-percent annual inflation factor to estimate future, nominal costs for capital expenditures based on the 30-year historical inflation trends measured the by Caltrans' highway construction cost index. The faster increase in construction costs than in revenues contributes to a decline in purchasing power for transportation funding over the RTP planning period.
286-01	Anonymous		Given all of the quantitative easing that we've had just in the past year and a half and given that there's going to be more with what's going on in Europe I don't think that you're inflation rate will be 2%. I think that we're probably looking at double digit minimum that's going to take these projections out.	Comment noted. We recognize that the future cannot be known with certainty and therefore make reasonable assumptions, which were vetted through SCAG's Technical Advisory Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate. At a minimum, an RTP is prepared and adopted every four years.
287-01	Anonymous		If every 4 years you're making adjustments. Say inflation starts increasing after 4 years at 3 and by the time that you get to 12 years it's up 10 percent. We're no longer looking at a $100M project. We're talking about a project that's going to cost $150M. Right now, 40% of every dollar that the feds spend is being borrowed from China. That will increase the way that things are going. Where are we going to get all of this money?	Comment noted. The Transportation Finance Appendix provides detailed explanation on all revenue sources included in the RTP.
288-01	Anonymous		Why would we start on a project when we're so unhealthy to	Comment noted.

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			begin with?	
289-01	Anonymous		You said that the money is already there that is being used to do these projects?	Comment noted. The Transportation Finance Appendix provides a detailed explanation on all revenue sources included in the RTP.
290-01	Anonymous		That's not true because already they're complaining that there's no money, no tax revenue, no money coming in to fix roads or anything else. Secondly, I spoke about the elderly but what I didn't bring up is that getting the kids to school, sporting events, going to church, if you have to count on all of this to get you places it's not going to happen.	Comment noted.
291-01	Anonymous		Ok, but what you want to do is tax these same people to use their own car and to provide the rail and bus system to get them to where they are.	Comment noted.
292-01	Anonymous		If people are counting on going on trains and buses if it comes to that then who is going to be there to take these people when their children, spouse or someone has an emergency. How are they going to get back and forth?	Comment noted.
293-01	Anonymous		My understanding is that part of the SCAG process is taking place because of federal grant money that has come down to the states, to the cities. Is that correct?	Comment noted. SCAG is funded, in part, through the U.S. Department of Transportation consolidated planning grant funds.
294-01	Anonymous		Where is the money for the planners and the presenters and the developers of this RTP coming from?	Comment noted. SCAG is funded primarily through the U.S. Department of Transportation, the State of California, and member agency dues.
295-01	Anonymous		So every time this plan is revisited, which is every 4 years, it's an increasing if nothing else in planning cost that involves a great many people. Is that correct?	Comment noted. The RTP is a federally mandated document. Therefore, these planning efforts are funded primarily through the U.S. Department of Transportation, the State of California, and member agency dues. However, SB 375 compliance is required per state law which is currently unfunded. So, SCAG absorbs these cost through other local sources. Cost of planning over the years have remained relatively unchanged.
296-01	Anonymous		I guess that what I'm getting at is that under the circumstances, we know that our state is in debt and we know that we don't have the money to do it. We know that we don't have the money to revisit it every 4 years so why not find something realistic based on the economy that we currently have and the knowledge that it will take at least 10 years for the economy to take an upturn so that there are some additional taxpayer funds spent for revisiting these plans.	Comment noted. We recognize that the SCAG region, California, and the nation continue to slowly recover from the Great Recession. However, the RTP spans a time horizon that stretches to 2035. There will likely be a number of different economic cycles over the course of those 20 plus years just as economic conditions have varied substantially over the last 20 years. We recognize that the future cannot be known with certainty and therefore we make reasonable assumptions, which were vetted through SCAG's Technical Advisory

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				Committee and Policy Committees and are well documented in the RTP. As we gain more insight into future funding options, we will update the financial plan accordingly through amendments and/or subsequent Plan updates as appropriate.
297-01	Anonymous		Are those all green projects under the international codes?	Comment noted. SB 375 does not require that a jurisdiction's land use policies and regulations, including building codes and design guidelines, need to be consistent with the RTP or SCS. While the SCS is intended to provide a regional policy foundation that local governments may build upon if they so choose and generally includes the quantitative growth projections from each city and county in the region, local jurisdictions maintain local land use authority.
298-01	Anonymous		It does have to do with SCAG because they have speakers, they have joint projects and I have newspaper articles. SCAG is very involved in that and it's how you're set up.	Comment noted.
299-01	Anonymous		Regarding the whole plan. The way that the pictures are represented seems to indicate that there's going to be a complete change in terms of our housing development or commercial development and it's all kind of vertically concentrated so that you can walk out and catch a train or go wherever you're going to go. That has to go hand in hand with maintaining the roadways and all those other things that you plan on doing. When I drive from San Diego to LA to here, there's a constant city after city.	Comment noted. The 2012 RTP/SCS includes a range of both transportation and land use strategies to meet the needs of a large and diverse region. Operation and maintenance of the existing highway system is a critical component of this Plan.
300-01	Anonymous		Please name me a city that you are talking about that we can look at.	Comment noted. Examples of the strategies referenced in this Plan are occurring in a myriad of jurisdictions within and outside of the SCAG region.
301-01	Anonymous		We all know that bike lanes and streets are very dangerous because many cars and trucks can't see the bikers and the bikers don't follow many rules of the law of the road like cars do. Someone mentioned bike lanes and these sidewalks. This is very dangerous to pedestrians because I almost got killed in Amsterdam because bikes ride in both directions on the sidewalk. Again, it comes down to the elderly who can't hear the bicycles and sometimes can't see them if they're coming from behind so please take that into consideration.	Comment noted. The RTP includes a Transportation Safety Appendix which contains policies and actions to address bike safety issues.
302-01	Anonymous		Revolving around the issue but I know that we've all heard of Agenda 21 and right here is a book that says something about environmental justice and if you go to the Agenda 21 page it has	Comment noted. Consideration of environmental justice in the transportation planning process stems from Title VI of the Civil Rights Act of 1964 (Title VI). Title VI establishes the need for

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			the exact same wording that you have in your book as it does in Agenda 21 which is an international agenda for development. You are all taking it straight from the science and you're putting out this thing to our country. That's not what this country was built on and all of you that are doing this consciously know that you're eroding our freedoms and your own freedoms. If you may not know this then you need to go onto the website.	transportation agencies to disclose to the public the benefits and burdens of proposed projects on minority populations. Title VI states that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." As a government agency that receives federal funding, SCAG is required to conduct an environmental justice analysis for its Regional Transportation Plan.
303-01	Anonymous		We're going to spend a billion dollars an acre to go through an expensive area rather than a ten-thousand an acre to go through a poor area?	Comment noted.