

Section 3. Master Responses

The following responses are presented for those topics on which several comments were submitted. This approach is intended to provide a more comprehensive, integrated response than might be provided if the comments were addressed individually. The topics are grouped into five major categories: (1) Growth Forecast(s) in the RTP, (2) Program EIR versus Project/Site Specific EIR, (3) the Role of SCAG and SCAG's Authority, (4) Mitigation Measures, and (5) Alternatives.

1. Growth Forecast(s) in the RTP

The 2008 Regional Transportation Plan (RTP) includes an adopted growth forecast, pursuant to federal transportation planning requirements 23 CFR 450.322(c) and (e). As part of each RTP update process, SCAG must confirm the RTP's validity and consistency with current and forecasted transportation and land use conditions and trends and to extend the forecast period to at least a 20-year planning horizon. As required, SCAG based the 2008 RTP on the latest available estimates and assumptions for population, land use, travel, employment, congestion, and economic activity. This helps to ensure that regional transportation planning addresses anticipated growth. In preparing a detailed growth forecast for the region in accordance with the described requirements, SCAG undertakes an extensive growth forecasting process as part of the overall RTP development process.

The 2008 RTP is a transportation plan for the SCAG region. It is not a land use plan. A growth forecast is simply an estimate of future conditions.

As explained in the Draft 2008 RTP Program Environmental Impact Report (PEIR) Project Description (pp. 2-7 to 2-14), SCAG developed two major growth forecasts (both forecasts are discussed extensively throughout the Draft PEIR):

Baseline Growth Forecast: This forecast is based on recent local input, current and expected demographic and economic trends, and previously adopted local land use policies within the SCAG region. Population, households and employment were projected using standard, high-level forecasting techniques and models. The Baseline Growth Forecast was the starting point for developing growth scenarios. These scenarios were an attempt to explore the range of future growth possibilities in the region.

Policy Growth Forecast: This forecast was developed as the result of the scenario building process, including input from area planners, and represents a realistic future urban form that incorporates existing and emerging development patterns that increase the benefits of existing and planned transportation investments. The Policy Growth Forecast and Baseline Forecast are identical through 2015.



Both the Baseline Growth Forecast and Policy Growth Forecast used the latest available estimates and assumptions of population, households, employment, land use, travel, congestion, and economic activity. Trip generation and distribution were modeled to identify transportation and air quality impacts for the region. Both the Baseline Growth Forecast and the Policy Growth Forecast meet the legal requirements of the 2008 RTP regarding the use of the latest available estimates and assumptions.

Only the regional forecast totals and the county level totals have been adopted as part of the 2008 RTP growth forecast. Both forecasts have the same regional totals. Both forecasts have been evaluated and tested for reasonableness and capacity at the small area level.

On March 6, 2008, the SCAG Regional Council adopted the Baseline Growth Forecast for the 2008 RTP. Additionally, the Regional Council determined that a statement of land use policies/strategies would remain in the 2008 RTP as advisory only. SCAG's adopted growth forecast is not a plan indicating where growth should occur, but rather forecasts where growth is most likely to occur. SCAG does not have the authority to undertake land use planning.

The adopted, advisory land use policies/strategies in the 2008 RTP are based upon the previously adopted Compass Blueprint Principles that were included in the 2004 RTP. The Compass Principles were designed to provide planning policy guidance to SCAG member agencies and subregional organizations in order to make growth in the region more sustainable (i.e., less demand for energy and water, preservation of open space, reduced emissions including greenhouse gases, etc.). Additionally, new requirements such as the Global Warming Solutions Act (AB 32), place mandates on California to reduce greenhouse gas emissions to 1990 levels by 2020. The adopted Regional Council advisory land use policies in the 2008 RTP are intended to guide the region in addressing such requirements.

Many communities have already started incorporating sustainable planning practices into their General Plans within the past several years. The Baseline Growth Forecast will capture some of these sustainable planning activities that are already underway (e.g. more transit-oriented development resulting in fewer vehicle trips and fewer emissions). Some communities have yet to reflect these planning activities in their General Plans, resulting in a more conservative view of the region in 2035 compared to the Policy Growth Forecast. The analysis of the Baseline Forecast presented in the PEIR (for the No Project Alternative throughout the Draft PEIR and for the Final RTP in Section 2 of this Final PEIR Addendum) is conservative, since it is anticipated that the growth pattern will be more compact than anticipated by the Baseline Forecast and therefore impacts associated with the less compact growth form will not be as severe as described. SCAG seeks with the statement of advisory land use policies/strategies to encourage such

communities to consider these policies/strategies as part of future, local land use development decisions.

As discussed further in Master Response 4 below, transportation planning is inextricably intertwined with land use. The Draft RTP included both the Baseline and Policy growth forecasts. The Draft PEIR analyzed the Baseline Growth Forecast as part of the No Project Alternative comparison of impacts in each section of the Draft PEIR and in the Alternatives chapter.

The No Project Alternative includes the same growth forecast (the Baseline Growth Forecast) as in the Final RTP. Modeling was performed for the Draft RTP using the Baseline Growth Forecast in the No Project Alternative, and the Draft PEIR analyzed associated environmental impacts. Revising the growth forecast from Policy to Baseline for the Final RTP does not result in any substantial impacts not previously analyzed in the Draft PEIR. Revising the growth forecast to Baseline results in project impacts associated with land use patterns similar to those impacts analyzed for the No Project Alternative described in each section of the Draft PEIR as well as in the Alternatives chapter. Modeled impacts (traffic, air quality, noise) for the refined RTP are within the range of impacts identified for the Draft RTP and alternatives analyzed in the Draft PEIR, and/or within the error margin of the models used for analysis. Because it is anticipated that growth patterns will be more compact than those shown for the Baseline forecast, impacts associated with land use consumption presented in the Draft PEIR are conservative. See Section 2 of this Addendum for a discussion of how impacts for the Final RTP would be similar to those of the Draft RTP and No Project Alternative.

2. Program EIR versus Project/Site Specific EIR

This 2008 RTP PEIR is a programmatic document that provides a region-wide assessment of the potential significant environmental effects of implementing the projects, programs, and policies included in the 2008 RTP. The California Environmental Quality Act (CEQA) allows that a Program EIR, “may be prepared on a series of actions that can be characterized as one large project and are related either (1) geographically, (2) as logical parts of the chain of contemplated actions, (3) in connection with issuance of rules, regulations plans or other general criteria to govern the conduct of a continuing program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways” (CEQA Guidelines § 15168). The 2008 RTP PEIR offers regional scale analysis and a framework of mitigation measures for subsequent, site specific environmental review, including project level EIRs and/or Environmental Impact Statements (EISs) prepared by implementing agencies as individual projects in the 2008 RTP are developed as well as General Plans and associated environmental documents.

The focus of the environmental analysis in the 2008 RTP PEIR is on potential regional-scale and cumulative impacts associated with implementation of the 2008 RTP as a

whole. It does not include site specific analysis of any project contained in the 2008 RTP. Many of the highway, arterial, goods movement, and transit projects included in the 2008 RTP are identified at a very preliminary conceptual level, and detailed site specific analysis is not possible or appropriate at this time. This RTP PEIR addresses environmental impacts to the level that they can be assessed without undue speculation [CEQA Guidelines Section 15126.6(f)(3)]. Projects contained within the 2008 RTP will require additional site-specific environmental analysis to assess impacts at the project level. As the 2008 RTP PEIR is a programmatic, regional planning document, it is not intended to provide information in detail sufficient for project-specific analyses. Many of the projects identified in the 2008 RTP have not yet gone through a full planning process and do not have final alignments or other details of project components.

While the RTP PEIR identifies a number of significant and potentially significant impacts at the regional level, these impacts must be separately assessed for each individual project to determine whether any individual project (or General plan) would have significant or potentially significant impacts at the local or sub-regional level. Subsequent project-level environmental evaluations will determine whether or not an individual project (or plan) has significant, project-level impacts.

3. Role of SCAG and SCAG's Authority

SCAG is the federally designated Metropolitan Planning Organization (MPO) under Title 23, United States Code (USC) Section 134(d)(1) for the six county region which includes the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. SCAG is legally organized as a Joint Powers Authority pursuant to Government Code Section 6500 et seq. Additionally, under state law, SCAG is designated as a Council of Governments (COG) and a Multi-County Designated Transportation Planning Agency. As such SCAG has a number of formal authorities and responsibilities, including:

- Conducting comprehensive transportation planning and programming processes that result in an RTP and a Regional Transportation Improvement Program (RTIP), pursuant to federal law and regulations (23 USC 134 et seq., 23 CFR 45 et seq.) and state law (Cal. Gov. Code Sections 65080 and 65082). Together these documents serve as the legal basis for transportation decision-making in the region.
- Conducting a comprehensive environmental planning process, including a Program Environmental Impact Report (PEIR) for the RTP (SCAG is the lead agency under CEQA for the RTP).
- Reviewing and assessing Environmental Impact Reports (EIRs) for all projects of regional significance (CEQA Guidelines Sections 15125(d) and 15206).

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- Determining, pursuant to the federal Clean Air Act, the conformity of SCAG's RTPs and TIPs (and amendments to RTPs and TIPs) to the state air quality implementation plan. 42 USC Sections 7401-7671(q), 40 CFR Parts 51 and 93.
- Developing demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the South Coast Air Quality Management Plan. Cal. Health and Safety Code Section 40460(b)-(c).
- Conducting inter-governmental review of programs proposed for federal financial assistance. (Federal Executive Order No. 12372; 47 FR 30959, Issued 7/14/82).
- Preparing and adopting the Regional Housing Needs Assessment, pursuant to California Government Code Section 65584 et seq.

SCAG has no project implementation authority, but works cooperatively with County Transportation Commissions, the Imperial Valley Association of Governments, and other implementing agencies. SCAG has no land use authority and cannot overturn local land use authority; land use planning is conducted at the local level. SCAG is a consensus-building organization that encourages and provides a forum for dialogue among its member jurisdictions about the future of the region. One such way SCAG is doing this is through the Compass Blueprint/Growth Visioning program, an advisory program that provides local agencies tools to make changes that promote more compact landform and more sustainable development in general. See Master Response 1 above regarding how the growth forecasts were developed. SCAG cannot require cities to amend their general plans to address the RTP. SCAG is committed to working cooperatively with local governments beyond the adoption of the RTP to identify opportunities for planning and development that achieve consensus planning and mutual benefit.

SCAG has no jurisdictional authority over the marine ports, but does work cooperatively with local, state and federal agencies on a variety of issues related to the ports, including mitigation.

SCAG provides many services to its members, including: socioeconomic data, Geographic Information Systems (GIS) mapping, aerial photography, transportation and air quality modeling, and technical assistance in areas such as housing policy, land use policy, economic development policy, and legislative policy. SCAG supports its member subregions each year by funding a wide variety of subregion-sponsored transportation-related projects. SCAG's Intergovernmental Review of EIRs promotes the consideration of SCAG policies.

4. Mitigation Measures

The 2008 RTP would both accommodate growth and facilitate growth in certain areas of the region. Several of the transportation projects included in the RTP would provide access to previously inaccessible areas, or result in a shift in population due to changes in mobility and land use decisions associated with development of transportation projects. The RTP contemplates a planning horizon of more than 25 years in to the future, and as required under CEQA Guidelines §15125(a), compares the year 2035 with existing (2008) conditions. In the year 2035, the region is anticipated to experience considerable traffic congestion as a result of population growth and land use decisions, including location of transportation investments. This transportation-land use connection makes it difficult to isolate the impacts of either transportation or land use, as such, CEQA requires discussion of feasible mitigation measures to reduce impacts related to both transportation projects as well as associated growth. Since growth associated with transportation projects can not be separated from growth that may not be associated with transportation, the PEIR provides general mitigation for all growth. In addition, whether directly related to transportation projects or indirectly related by resultant growth the RTP would contribute to cumulative impacts and therefore mitigation of direct, indirect and cumulative impacts is addressed comprehensively in this EIR.

CEQA Guidelines §15091 indicates that measures are appropriate for inclusion if they are under the responsibility and jurisdiction of another public agency and have been adopted by such other agency or can and should be adopted by such other agency. SCAG staff evaluated the mitigation measures included in the 2008 RTP PEIR to determine their feasibility and reviewed each of the suggested measures for clarity. Mitigation measures have been refined in response to comments -- see Section 6 Corrections and Additions.

The mitigation measures in the 2008 RTP PEIR have been identified to mitigate transportation and growth related impacts associated with the 2008 RTP. As transportation and land use are inextricably linked, transportation investments substantially impact growth patterns. Therefore mitigation of land use/growth impacts as part of mitigation of the RTP is required by CEQA. These mitigation measures are independent of the Regional Comprehensive Planning process (a separate process being undertaken by SCAG that focuses on environmental planning considerations in the region). The mitigation measures proposed would substantially lessen significant effects that could result from implementation of the RTP and associated growth.

Most land use planning in the region is influenced, at least in part, by transportation infrastructure and planning. The mitigation measures included in the 2008 RTP PEIR help inform decision-makers and the public of the potential significant effects associated with adopting the 2008 RTP and the mitigation measures available to address both direct and indirect impacts of adopting the RTP.

In general, the terms “project sponsor” and “project implementing agency” are used interchangeably in the PEIR. Both terms are intended to refer to public or private agencies or individuals authorized to implement a wide range of projects, including projects contained in the RTP, while project sponsor is intended to be more generally applicable to a wider range of projects, and possibly including private development projects. Nonetheless, both types of mitigation (those intended for RTP projects and those more generally identified) would serve to mitigate the impacts of each type of project, therefore the terms are effectively interchangeable.

The terms “project implementing agency” and “project sponsor” also apply to cities and counties when they prepare General and/or Specific (and/or other types of land use) Plans; County Transportation Commissions when they undertake transportation projects; and to developers undertaking private projects.

Many comments requested changes in language of mitigation measures; the following changes were made in response to comments received (see Section 6 Corrections and Additions):

- Change in language from “shall” to “should” – many measures may not be feasible in every possible case. Therefore agencies “should” consider and discuss the measures pursuant to CEQA Guidelines §15162.4.
- Where appropriate the implementing agency was clarified and a type of entity is now identified.
- The term “as practical and feasible” was added to several mitigation measures to clarify those mitigation measures that may not be feasible in certain instances. CEQA requires implementation of measures that are feasible [CEQA Guidelines §15041 and §15126.4(a)].

5. Alternatives

CEQA §15126.6 requires that an EIR discuss a “range of reasonable alternatives to the proposed project which would feasibly attain most of the basic project objectives of the project,” but would avoid or substantially lessen any of the significant effects of the project. An EIR need not consider every conceivable alternative. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

The 2008 RTP PEIR includes three alternatives to the proposed project: the 2004 Modified RTP, the No Project and Envision. Each Alternative includes different growth forecasts and transportation networks (the Envision Alternative includes the same transportation network as the proposed project). As a result of revisions made to the

Draft 2008 RTP in response to comments and consistent with SCAG Regional Council adoption of the Baseline Growth Forecast, this Final PEIR includes discussion of the refined RTP including the Baseline Growth Forecast and final project list and transportation network. (See Section 2, Revisions Since Publication of the Draft EIR and Section 6, Corrections and Additions, Response to Comments Final 2008 RTP PEIR Addendum). The refinements made to the RTP since publication of the Draft PEIR are within the range of alternatives analyzed in the Draft PEIR.

Adoption of the Baseline Growth Forecast for the RTP rather than the Policy Growth Forecast, results in project impacts associated with land use patterns similar to those described for the No Project Alternative described in each section of the PEIR as well as in the Alternatives chapter. Modeled impacts (traffic, air quality, noise) for the Final RTP are within the range of impacts identified for the project and alternatives analyzed in the Draft PEIR, and/or within the error margin of the models used for the analysis. See Section 2 for a discussion of how impacts for the Final RTP would be similar to those of the Draft RTP and No Project Alternative.

See Section 2 of this Final 2008 PEIR Addendum for a discussion of Revisions Since Publication of the Draft PEIR. The PEIR is not required to discuss every conceivable alternative. A discussion of the Final RTP is included to better facilitate decision-maker understanding of the combination of Final 2008 RTP projects with the Baseline Growth Forecast.

